

EXHIBIT 27

In The Matter Of:
RUTH V. BRIGGS v.
TEMPLE UNIVERSITY

JIE WU
May 31, 2017

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RUTH V. BRIGGS v.
TEMPLE UNIVERSITY

JIE WU
May 31, 2017

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
3 - - -
4 RUTH V. BRIGGS, :
5 Plaintiff, :
6 v. : Civil Action
7 TEMPLE UNIVERSITY, : No. 16-00248
8 Defendant. :
9 - - -
10 Philadelphia, Pennsylvania
11 Wednesday, May 31, 2017
12 - - -
13 Deposition of JIE WU, taken pursuant
14 to notice, held at Console Mattiacci Law, LLC,
15 1525 Locust Street, Ninth Floor, Philadelphia,
16 Pennsylvania, beginning at 10:00 a.m., on
17 Wednesday, May 31, 2017, before Terry Barbano
18 Burke, RMR-CRR.
19
20
21
22 TERRY BURKE REPORTING
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1 APPEARANCES:
2 RAHUL MUNSHI, ESQUIRE
3 Console Mattiacci Law, LLC
4 1525 Locust Street, Ninth Floor
5 Philadelphia Pennsylvania 19102
6 Counsel for the Plaintiff
7 RACHEL FENDELL SATINSKY, ESQUIRE
8 Littler Mendelson, P.C.
9 Three Parkway
10 1601 Cherry Street, Suite 1400
11 Philadelphia, Pennsylvania 19102
12 Counsel for the Defendant
13 - - -
14 JIE WU,
15 SERC Center, 035-10, 1925 North 12th
16 Street, Room 362, Philadelphia,
17 Pennsylvania, having been duly sworn, was
18 examined and testified as follows:
19 BY MR. MUNSHI:
20 Q. Good morning, Dr. Wu.
21 A. Good morning. How are you?
22 Q. My name is Rahul Munshi. I am an
23 attorney here at Console Mattiacci Law, and I
24 have the privilege of representing Ruth Briggs
in this action that has been brought against
Temple.
You are here for your deposition.

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1 Do you understand that?
2 A. Yes.
3 Q. Have you ever had your deposition taken
4 before?
5 A. No.
6 Q. Let me tell you a little bit about how
7 depositions work generally.
8 A. Sure.
9 Q. I am going to be asking you a series of
10 questions here today. You are going to be
11 giving me answers to those questions. If I ask
12 you a question that you don't understand or you
13 want me to repeat, just go ahead and let me know
14 that. I will try to ask a better question or I
15 will just say the question again.
16 Okay?
17 A. Okay.
18 Q. You will see here that Terry is sitting
19 to your left, and you will see that she is
20 taking everything we are saying down so that a
21 transcript can be created later on.
22 As a result, we have to make sure we
23 do our very best to not talk over each other --
24 A. Sure, uh-huh.

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1 Q. And that is a good segue into my next
2 instruction, which is, if you could try to do
3 your very best to wait until I am done asking my
4 question before you start answering it, even if
5 you know where my question is going. I am going
6 to try to do my very best to not ask you a
7 question until you are done answering my
8 previous one.
9 Okay?
10 A. Okay.
11 Q. Similar instruction is, again, for the
12 purposes of the transcript, we have to make sure
13 we verbalize all of our answers. So head
14 shakes, head nods, those don't come out on the
15 transcript. So from time to time I may say "can
16 you please verbalize that."
17 A. Uh-huh.
18 Q. And that is what I mean.
19 Do you understand that?
20 A. Okay.
21 Q. If you do want to take a break at any
22 point, we will do our very best.
23 A. Uh-huh, okay.
24 Q. The last instruction I will give you,

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1 Dr. Wu, is the most important one, and that is
2 that you just took an oath here to tell the
3 truth. Even though you are in our conference
4 room and there is no judge present, there is no
5 jury present, with that oath comes the same
6 responsibility to tell the truth and the same
7 potential penalties of perjury if you do not
8 tell the truth.
9 Do you understand that?
10 A. Yes, I understand.
11 Q. Please verbalize.
12 And that goes for an answer of "I
13 don't recall" when you do recall.
14 Do you understand that?
15 A. Yes, I understood.
16 MR. MUNSHI: Let's mark this
17 document as P-1.
18 (P-1 was marked for identification.)
19 BY MR. MUNSHI:
20 Q. I will represent to you, Dr. Wu, that
21 P-1 is a printout of a portion of a resume that
22 was on Temple's website. My only question for
23 you, and go ahead and review it, is if the
24 information under your employment history and

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1 education history is all accurate?
2 A. Yes, it is accurate.
3 Q. How about the education history on the
4 second page?
5 A. Yes.
6 Q. Good.
7 MR. MUNSHI: Let's have this
8 document marked as P-2, please.
9 (P-2 was marked for identification.)
10 BY MR. MUNSHI:
11 Q. Dr. Wu, I will represent to you that P-2
12 is another document that was printed from
13 Temple's website. It is a short biography.
14 If you can just review all of this
15 information and tell me if all of this is
16 accurate?
17 A. Yes, it's accurate because I prepared
18 it.
19 Q. Good.
20 Sometimes people prepare things not
21 accurately. But you have had a chance to review
22 it?
23 A. Yeah.
24 Q. What is your current position over at

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1 Temple?
2 A. I'm a professor computer science --
3 computer and information sciences, and also I'm
4 a center director. The center name is called
5 Center for Networked Computing.
6 And also I have a side job as
7 associate vice provost for international
8 affairs.
9 Q. And that is at Temple University as
10 well?
11 A. Yes, that's at Temple University.
12 Q. Are you the chair of any department
13 currently?
14 A. Not. I resigned last year.
15 Q. What were you the chair of?
16 A. Chair of department of computer and
17 information sciences.
18 Q. And you resigned from that position in
19 the year 2016?
20 A. Yes.
21 Q. Why did you resign?
22 A. It's like my term ends, two terms. I
23 extended one year.
24 Q. Your term ended, is that what you said?

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1 A. Yeah.
2 Q. Who is the current chair of the
3 department?
4 A. His name is Slobodan Vucetic. It's
5 difficult.
6 Q. We will do our best with the spelling of
7 the names afterwards.
8 A. Slobodan Vucetic. It's a Serbian name.
9 Q. Okay.
10 Do you have any folks reporting
11 directly to you now?
12 A. Yes. So I have two reporting lines.
13 One is to chair of the department. The other
14 one is provost of our university.
15 Q. Those are the people to whom you report;
16 correct?
17 A. Yes.
18 Q. Does anybody report to you currently?
19 A. Oh, it is complicated. Yeah, I have two
20 assistant vice president report to me, both for
21 international affairs. And also we have office,
22 Temple has office in China. So the director of
23 that office report to me.
24 Q. Anyone else report to you currently?

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<p style="text-align: right;">Page 9</p> <p>1 A. And at Temple, there is a Confucius 2 Institute in the university. So there are two 3 directors. Both directors report to me. 4 Q. Anybody else report to you directly 5 right now? 6 A. No. 7 Q. In the year 2014, 2013/2014 period, were 8 you the chairman of the department back then? 9 A. Yes. 10 Q. And you were also a professor back then; 11 correct? 12 A. Yes. 13 Q. And back in the years 2013/2014, can you 14 estimate for me the number of people who 15 reported directly to you? 16 A. It's about 50. 17 Q. Five zero? 18 A. Yes, five zero. 19 Q. What is your date of birth, Dr. Wu? 20 A. [REDACTED] 21 Q. Where were you born? 22 A. Shanghai, China. 23 Q. When did you move to the United States? 24 A. January 16, 1987.</p>	<p style="text-align: right;">Page 11</p> <p>1 A. Yes. 2 Q. And are you aware that under China's 3 law -- put aside the other countries -- 4 A. Yes. 5 Q. -- most women and white collar 6 professions must retire at the age of 55? 7 A. White collar, yes. White collar. 8 Q. Different for blue collar, right? 9 A. Yes. 10 Q. Under blue collar it is age 50? 11 A. Yes. 12 Q. But white collar are professions that 13 are in the office; right? 14 A. Yes. 15 Q. So for those women who work in the white 16 collar professions, the mandatory age is 55; 17 correct? 18 A. Uh-huh, uh-huh. 19 Q. Please verbalize. 20 A. Yes. 21 Q. So you are aware based on your 22 understanding of the law from growing up there 23 that Chinese law treats men and women 24 differently, there is a different age; right?</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. You remember the exact date? 2 A. Yes. 3 Q. So about 30 years ago? 4 A. Yeah. 5 Q. Did you live in China the whole time 6 before you moved to the United States? 7 A. Correct. 8 Q. Are you aware, Dr. Wu, that in China 9 there is a mandatory retirement law? 10 A. I think it's yes. Not just China, but 11 many other country in Asia. 12 Q. What other countries are you aware of? 13 A. As far as I'm told, Korea, Japan, Hong 14 Kong, Macau. 15 Q. As far as you understand, all of those 16 Asian countries have some sort of mandatory 17 retirement law? 18 A. Yes. 19 Q. As far as China's law goes, based on 20 your understanding and your history of growing 21 up there -- 22 A. Yeah. 23 Q. -- are you aware that under China's law 24 most men must retire at the age of 60?</p>	<p style="text-align: right;">Page 12</p> <p>1 MS. SATINSKY: Objection to form. 2 You can answer the question. 3 THE WITNESS: Yes, yes. 4 BY MR. MUNSHI: 5 Q. Did you ever have a discussion with Ruth 6 Briggs about China's retirement law? 7 A. We never discussed from the law 8 perspective. But we discuss after my travel, I 9 usually always have discussion with Ruth, share 10 my experience of my travel. So I think at one 11 point we discussed about it. But nothing for 12 retirement. Just say womens retire early. 13 Q. What do you recall about those 14 conversations you had with Ruth Briggs? 15 A. When? 16 Q. What do you recall about it? 17 A. Oh, just it's kind of very casual 18 conversation. We just shared experience of 19 culture. I just mentioned that, you know, women 20 retire early. 21 Q. Did you tell her that in China it is 22 actually the age 55 for some women? 23 A. No, no, no. 24 Q. So you just said women retire early, but</p>

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<p style="text-align: right;">Page 13</p> <p>1 you didn't say what age?</p> <p>2 A. Yes, actually I mentioned --</p> <p>3 MS. SATINSKY: Just wait until he is</p> <p>4 finished asking the question.</p> <p>5 THE WITNESS: Sorry.</p> <p>6 MS. SATINSKY: That is okay. It</p> <p>7 will come out cleaner for the transcript.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. Did you say anything about the age,</p> <p>10 specific number of age, or did you just say</p> <p>11 early?</p> <p>12 A. I don't remember exactly, but I do</p> <p>13 mention cases women retire very early, including</p> <p>14 my sister.</p> <p>15 Q. When you said "very early," what were</p> <p>16 you referring to?</p> <p>17 A. Early could be 40, 50, women last job.</p> <p>18 Q. Do you remember when you had this</p> <p>19 conversation with Ruth Briggs?</p> <p>20 A. It's awhile ago., Maybe five years, six</p> <p>21 years ago.</p> <p>22 Q. And was this one conversation or did you</p> <p>23 have multiple conversations with her regarding</p> <p>24 the culture in China?</p>	<p style="text-align: right;">Page 15</p> <p>1 retire, they continue work and go back to the</p> <p>2 same place and continue work.</p> <p>3 Q. What do you mean by that, after they</p> <p>4 retire they continue working?</p> <p>5 A. Yeah, they continue working. You can</p> <p>6 rehire them.</p> <p>7 Q. So what is the retirement, what are you</p> <p>8 retiring from?</p> <p>9 A. So I think the main purpose is that you</p> <p>10 don't want a person to hold a position for too</p> <p>11 long, especially like a leadership position.</p> <p>12 Q. Is it your understanding that the same</p> <p>13 concepts and the same laws are in the United</p> <p>14 States?</p> <p>15 A. I'm not sure of the retirement age. I</p> <p>16 know university probably not, but in many</p> <p>17 company I think that there is discussion, I</p> <p>18 think maybe even with Ruth, that you don't see</p> <p>19 many people -- I mean once you reach a certain</p> <p>20 age, you retire.</p> <p>21 Q. What is that certain age from your own</p> <p>22 experiences?</p> <p>23 A. I don't know. It varies. But</p> <p>24 university can work until 70's.</p>
<p style="text-align: right;">Page 14</p> <p>1 A. I just remember once.</p> <p>2 Q. Do you remember where this conversation</p> <p>3 took place?</p> <p>4 A. In my office.</p> <p>5 Q. And what prompted this conversation?</p> <p>6 Did she ask you about the culture in China or</p> <p>7 did you just offer it yourself?</p> <p>8 A. No. I don't remember the content, but</p> <p>9 we discussed many things.</p> <p>10 Q. And we are just talking right now about</p> <p>11 this concept that over in China --</p> <p>12 A. Yeah.</p> <p>13 Q. -- there is this mandatory law; right?</p> <p>14 A. No, no, I never discussed mandatory law.</p> <p>15 I just said women retired early and there are</p> <p>16 many cases, certain job -- for certain</p> <p>17 discipline, they required young women. Like in</p> <p>18 the restaurant. More labor.</p> <p>19 Q. And now we are talking about China;</p> <p>20 right?</p> <p>21 A. Yes, China.</p> <p>22 Q. And is it your understanding that this</p> <p>23 is a cultural characteristic of China?</p> <p>24 A. No, not really, because Chinese, after</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. And is it your understanding that Temple</p> <p>2 has a mandatory retirement age?</p> <p>3 A. I don't think so.</p> <p>4 Q. Are you aware of any companies in the</p> <p>5 United States that have mandatory retirement</p> <p>6 ages?</p> <p>7 A. I don't remember. I don't think so.</p> <p>8 Q. Are you aware of any laws in the United</p> <p>9 States that do require folks to retire at a</p> <p>10 certain age?</p> <p>11 A. No.</p> <p>12 Q. Are you aware of any laws in the United</p> <p>13 States that prohibit companies from putting</p> <p>14 mandatory retirement ages?</p> <p>15 A. I'm not sure, but I don't see any like</p> <p>16 law that say we have to retire certain age.</p> <p>17 Q. You said that the conversation about how</p> <p>18 it works over in China with certain women</p> <p>19 retiring, was that one conversation or multiple</p> <p>20 conversations?</p> <p>21 A. I think --</p> <p>22 MS. SATINSKY: Hold on. Objection</p> <p>23 to form. Asked and answered. You can answer</p> <p>24 the question.</p>

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<p style="text-align: right;">Page 17</p> <p>1 THE WITNESS: I recall just maybe 2 once. 3 BY MR. MUNSHI: 4 Q. And this took place at a time where Ruth 5 Briggs was reporting directly to you; correct? 6 A. Yes. 7 Q. And do you recall that Ruth Briggs 8 started reporting directly to you in around 9 2009? 10 A. Yes. 11 Q. And she left Temple in 2014? 12 A. Yes. 13 Q. So the conversation with Ruth happened 14 sometime between 2009 and 2014; correct? 15 MS. SATINSKY: Objection. Asked and 16 answered. You can answer the question. 17 THE WITNESS: Correct. 18 BY MR. MUNSHI: 19 Q. Did you have an understanding at the 20 time you had this conversation with Ruth that 21 she was in her 50s? 22 A. I do not know, but she's not the 23 youngest one. We have many senior staff member. 24 Q. Not my question. Just talking about</p>	<p style="text-align: right;">Page 19</p> <p>1 like a one-hour conversation, so we talk about 2 different culture, the habit of eating, the 3 habit of working. So this is just like a very 4 small piece of conversation. 5 Q. And do you make it known at your job at 6 Temple that you are from China? 7 A. Oh, everyone knows by looking. 8 Q. Everyone knows that you are from China? 9 A. Yes. 10 Q. Did you ever say, Dr. Wu, words to the 11 effect that women in China are put out to 12 pasture at age 55? 13 A. No, I never say that word. I don't even 14 know that word. 15 Q. Which word? 16 A. The word you just said. 17 Q. Pasture? 18 A. Pasture, yeah. 19 Q. Never heard that word before in your 20 life? 21 A. No. 22 MR. MUNSHI: Let's have this 23 document marked as <u>P-3</u>. 24 (<u>P-3</u> was marked for identification.)</p>
<p style="text-align: right;">Page 18</p> <p>1 Ruth. Okay? 2 A. Yeah. 3 Q. Did you have an understanding when you 4 had this conversation with Ruth that she was in 5 her 50s? 6 MS. SATINSKY: Objection. Asked and 7 answered. You can answer the question. 8 THE WITNESS: Yeah, I think so, 9 because she and I probably similar age. 10 BY MR. MUNSHI: 11 Q. Did you ever say to her words to the 12 effect of most women in China do retire at the 13 age of 55? 14 MS. SATINSKY: Objection. Asked and 15 answered. 16 You can answer the question. 17 THE WITNESS: I don't think so. I 18 don't put a number, like 55. But even we have 19 these conversations, nothing to do with 20 retirement. Just discussed the culture things. 21 BY MR. MUNSHI: 22 Q. When you say it had nothing to do with 23 retirement, what do you mean by that? 24 A. Because we have a long conversation,</p>	<p style="text-align: right;">Page 20</p> <p>1 MR. MUNSHI: Let's have this one 2 marked as <u>P-4</u>. 3 (<u>P-4</u> was marked for identification.) 4 BY MR. MUNSHI: 5 Q. Dr. Wu, in your hands you have two 6 different documents here. One is marked <u>P-3</u> and 7 one is marked <u>P-4</u>. 8 <u>P-3</u> is the complaint that was filed 9 in this lawsuit -- 10 A. Uh-huh. 11 Q. -- from Ruth Briggs. 12 <u>P-4</u>, that is on the table, this is 13 Temple University's answer to the complaint. 14 Do you see that? 15 A. Yes. 16 Q. Looking at <u>P-3</u>, which is in your hand 17 right here, you will see as you flip through it 18 there are numbered paragraphs. 19 A. Which page? 20 Q. So let's look at Page 4, and the 21 numbered paragraph of 24. 22 Paragraph 24 states, "By way of 23 example, on or about November 9, 2011, Dr. Wu (a 24 Chinese national) stated to plaintiff, who is</p>

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<p style="text-align: right;">Page 21</p> <p>1 turning 57 years old the next day, that women in 2 China are 'put out to pasture at the age of 3 55.'"</p> <p>4 Do you see that?</p> <p>5 A. Yes, I see that.</p> <p>6 Q. You see that, okay.</p> <p>7 Did that ever happen?</p> <p>8 MS. SATINSKY: Objection. Asked and 9 answered. You can answer the question one more 10 time.</p> <p>11 THE WITNESS: Yeah, never have 12 because I don't even know the word pasture.</p> <p>13 BY MR. MUNSHI:</p> <p>14 Q. If you can go to <u>P-4</u>, which is the 15 document on the table.</p> <p>16 You will see that these are numbered 17 paragraphs as well. If you can go to numbered 18 Paragraph 24. And you will see the 19 word "denied"; right?</p> <p>20 A. Yes.</p> <p>21 Q. This is an accurate statement in this 22 answer that that paragraph is denied; correct?</p> <p>23 A. Yes, correct.</p> <p>24 Q. Do you see here in the lawsuit, which is</p>	<p style="text-align: right;">Page 23</p> <p>1 kind of comments about her.</p> <p>2 BY MR. MUNSHI:</p> <p>3 Q. But you see that she has made those 4 assertions; right?</p> <p>5 A. Yes, I see it.</p> <p>6 Q. And so I understand clearly, you dispute 7 making an age-based or sex-based comment to her 8 or about her; correct?</p> <p>9 MS. SATINSKY: Objection to form. 10 Are you referring to Paragraph 24?</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. Yes.</p> <p>13 A. Okay. I understand.</p> <p>14 Q. And do you agree with me that you are 15 disputing that you made an age-based or 16 sex-based comment to her as listed in 17 Paragraph 24?</p> <p>18 A. Yes, I agree.</p> <p>19 Q. Have you ever made an age-based or 20 sex-based comment to Ruth Briggs?</p> <p>21 A. I don't think so.</p> <p>22 Q. And if she has asserted in this lawsuit 23 that you did in fact make age-based and/or 24 sex-based comments, you are going to dispute</p>
<p style="text-align: right;">Page 22</p> <p>1 <u>P-3</u>, that Miss Briggs has asserted in this suit, 2 which is in federal court, that you did in fact 3 make a statement to her about women being put 4 out to pasture at the age of 55? Do you see 5 that in the lawsuit?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Please verbalize.</p> <p>8 A. Yes.</p> <p>9 Q. And do you understand that the assertion 10 that she has made in this complaint in this 11 lawsuit is that you made an age-based comment 12 about her?</p> <p>13 MS. SATINSKY: Objection to form.</p> <p>14 THE WITNESS: I understand what she 15 said, but I didn't do that.</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. And do you understand based on your 18 review of the complaint and the paragraph that 19 you say didn't happen that Ruth Briggs has 20 asserted in this lawsuit in federal court that 21 you made a sex-based or gender-based comment 22 about her?</p> <p>23 MS. SATINSKY: Objection to form.</p> <p>24 THE WITNESS: I did not make that</p>	<p style="text-align: right;">Page 24</p> <p>1 that; correct?</p> <p>2 A. Correct.</p> <p>3 Q. Do you agree with me that a comment such 4 as, words to the effect of, "In China, women in 5 China are put out to pasture at the age of 55," 6 do you agree with me that that would be an 7 inappropriate thing to say in the workplace?</p> <p>8 MS. SATINSKY: Objection to form.</p> <p>9 THE WITNESS: Yes, it's 10 inappropriate.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. Do you agree with me that using 13 unprofessional or inappropriate language or 14 stating unprofessional or inappropriate comments 15 in the workplace might be a violation of 16 Temple's policies?</p> <p>17 MS. SATINSKY: Objection to form.</p> <p>18 THE WITNESS: Yes, I understand.</p> <p>19 MR. MUNSHI: Let's have this 20 document marked as <u>P-5</u>, please. 21 (<u>P-5</u> was marked for identification.)</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. The document in front of you, Dr. Wu, on 24 the first page is called Temple University Rules</p>

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<p style="text-align: right;">Page 25</p> <p>1 of Conduct. Feel free to review it.</p> <p>2 My question is, are you familiar</p> <p>3 with this document?</p> <p>4 A. (Pause.)</p> <p>5 Yes, I know this document. When I</p> <p>6 joined Temple, I was handed this document.</p> <p>7 Q. And you will see in the lower right-hand</p> <p>8 corner of this document there are various page</p> <p>9 numbers, Temple, and then a number.</p> <p>10 Do you see that?</p> <p>11 A. Yeah.</p> <p>12 Q. Can you go to the page that is</p> <p>13 Temple 159. This page has a header of "Category</p> <p>14 C Violations."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And there is the third section down is</p> <p>18 "C3, disruptive or disorderly conduct."</p> <p>19 Do you see that?</p> <p>20 A. Uh-huh.</p> <p>21 MS. SATINSKY: Is that yes?</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. And it is a little faded, so let me know</p>	<p style="text-align: right;">Page 27</p> <p>1 MS. SATINSKY: Objection to form.</p> <p>2 You can answer the question.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. MUNSHI:</p> <p>5 Q. Were you ever disciplined or counseled</p> <p>6 or reprimanded at any point for making an</p> <p>7 age-based or sex-based comment to anybody at</p> <p>8 Temple?</p> <p>9 A. No, never.</p> <p>10 Q. And you are almost 60 years old now;</p> <p>11 right?</p> <p>12 A. 55.</p> <p>13 Q. You're 55, okay.</p> <p>14 And if someone said to you that in</p> <p>15 China men at age 60 are put out to pasture, how</p> <p>16 would that make you feel?</p> <p>17 MS. SATINSKY: Objection to form.</p> <p>18 You can answer the question.</p> <p>19 THE WITNESS: Obviously I would get</p> <p>20 offended.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Why would you be offended by that?</p> <p>23 A. Yeah, because you retire. You're forced</p> <p>24 to retire early, right?</p>
<p style="text-align: right;">Page 26</p> <p>1 if you can't read this, but the third bullet</p> <p>2 point down under C3 is, "Using any</p> <p>3 unprofessional, inappropriate, profane, abusive,</p> <p>4 threatening or obscene language towards a</p> <p>5 supervisor, other employees, students, patients,</p> <p>6 clients, visitors or the public."</p> <p>7 Do you see that?</p> <p>8 A. Yeah, I see that.</p> <p>9 Q. Based on your experience as a manager</p> <p>10 over at Temple University, do you consider a</p> <p>11 comment to somebody, a staff member, that women</p> <p>12 in China are put out to pasture at the age of 55</p> <p>13 to be an unprofessional or inappropriate or</p> <p>14 threatening comment as listed in this document?</p> <p>15 MS. SATINSKY: Objection to form.</p> <p>16 You can answer.</p> <p>17 THE WITNESS: Yes, it's</p> <p>18 unprofessional.</p> <p>19 BY MR. MUNSHI:</p> <p>20 Q. If you said words to the effect of women</p> <p>21 are put out to pasture in China at the age of</p> <p>22 55, do you think it would be appropriate for</p> <p>23 that person to whom it was said to raise a</p> <p>24 complaint?</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. And if somebody said that to you, you</p> <p>2 may feel that they are telling you we don't want</p> <p>3 you any more; right?</p> <p>4 A. Yes.</p> <p>5 Q. Going back to P-3, which is the lawsuit.</p> <p>6 And let's go back to Page 4, and I read to you</p> <p>7 Paragraph 24. The next paragraph is</p> <p>8 Paragraph 25.</p> <p>9 It says, "Plaintiff interpreted</p> <p>10 Dr. Wu's comment, which was made to her right</p> <p>11 before her birthday, to mean that plaintiff</p> <p>12 should no longer be in the workforce as a result</p> <p>13 of her sex and age."</p> <p>14 Paragraph 26 states, "Plaintiff was,</p> <p>15 of course, insulted by Dr. Wu's comment and</p> <p>16 insinuation. At the time plaintiff had been</p> <p>17 employed by Temple for over ten years and</p> <p>18 intended to work for Temple for at least another</p> <p>19 ten years."</p> <p>20 And then Paragraph 27</p> <p>21 states, "Plaintiff politely replied to Dr. Wu</p> <p>22 that we are in the United States and not in</p> <p>23 China."</p> <p>24 Do you see that?</p>

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<p style="text-align: right;">Page 29</p> <p>1 A. Yes.</p> <p>2 Q. Did Ruth Briggs ever say words to you to</p> <p>3 the effect of, "We're in the United States, not</p> <p>4 in China"?</p> <p>5 A. No, I don't recall.</p> <p>6 Q. Do you dispute the assertion of</p> <p>7 Paragraph 27 that is in her lawsuit, which</p> <p>8 states that Miss Briggs, the plaintiff, said to</p> <p>9 you, "We're in the United States, not in China"?</p> <p>10 MS. SATINSKY: In response to?</p> <p>11 THE WITNESS: I don't recall she say</p> <p>12 that.</p> <p>13 BY MR. MUNSHI:</p> <p>14 Q. You don't recall one way or another?</p> <p>15 A. Yeah.</p> <p>16 Q. Is it possible she did say that to you?</p> <p>17 MS. SATINSKY: In response to this</p> <p>18 conversation are you referring to, or at any</p> <p>19 time?</p> <p>20 MR. MUNSHI: Both.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Did she ever say this to you at any</p> <p>23 time?</p> <p>24 A. I don't recall.</p>	<p style="text-align: right;">Page 31</p> <p>1 A. Yes.</p> <p>2 Q. Did you like her as a person?</p> <p>3 A. Yes. In fact, we invite her back after</p> <p>4 she lost the job for a party, a retirement party</p> <p>5 for another person, another staff member.</p> <p>6 Q. Who was that person?</p> <p>7 A. Called, her name is Ioni Newton.</p> <p>8 Q. Antoinette Newton?</p> <p>9 A. Yeah.</p> <p>10 Q. Did you personally invite Ruth Briggs?</p> <p>11 A. Staff member invite her.</p> <p>12 Q. So did you personally ever invite Ruth</p> <p>13 Briggs?</p> <p>14 A. I did not.</p> <p>15 Q. When you had this conversation with Ruth</p> <p>16 Briggs, what do you recall her mannerisms to be</p> <p>17 like, her reaction to be like?</p> <p>18 A. She's --</p> <p>19 MS. SATINSKY: Hold on. Objection</p> <p>20 to form. Which conversation are you talking</p> <p>21 about?</p> <p>22 MR. MUNSHI: Sorry.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. The conversation where you are talking</p>
<p style="text-align: right;">Page 30</p> <p>1 Q. And in response to this conversation</p> <p>2 that you are telling me happened several years</p> <p>3 ago, do you recall one way or another --</p> <p>4 A. Because I remember clearly our</p> <p>5 conversation was very friendly, casual, like</p> <p>6 culture exchange. There's no complaint from her</p> <p>7 during or after the conversation.</p> <p>8 Q. What made you think that it was friendly</p> <p>9 or casual from her perspective?</p> <p>10 A. The reason that we had very good terms,</p> <p>11 we always have conversation. We exchange gifts.</p> <p>12 We talk about different things, music and food</p> <p>13 and many other things, travels.</p> <p>14 Q. Do you believe you had a friendly</p> <p>15 relationship with Ruth Briggs?</p> <p>16 A. Yeah.</p> <p>17 MS. SATINSKY: If you weren't</p> <p>18 finished, go ahead.</p> <p>19 THE WITNESS: During the normal</p> <p>20 conversation, not work related. So we always</p> <p>21 exchange idea, talk different subjects.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Did you feel that you got along well</p> <p>24 with Ruth Briggs?</p>	<p style="text-align: right;">Page 32</p> <p>1 about what happens over in China with folks</p> <p>2 retiring early or very early?</p> <p>3 A. She's very interested and she smiled.</p> <p>4 We always, when we have conversation, it's very</p> <p>5 pleasant, always pleasant.</p> <p>6 Q. Just to be crystal clear here, I don't</p> <p>7 want to talk about other conversations. You</p> <p>8 said the word "always." I don't want to talk</p> <p>9 about other conversations.</p> <p>10 A. Yeah.</p> <p>11 Q. I just want to focus in on this one</p> <p>12 conversation where you are talking about in</p> <p>13 China folks or women retiring at some point.</p> <p>14 MS. SATINSKY: I just want to be</p> <p>15 clear for the record, you are pointing to the</p> <p>16 complaint, but --</p> <p>17 MR. MUNSHI: Not any more.</p> <p>18 MS. SATINSKY: I just want to be</p> <p>19 clear that your question does not refer to the</p> <p>20 complaint. It is referring back to a separate</p> <p>21 conversation.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Just referring to that one conversation.</p> <p>24 Do you recall her smiling during</p>

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<p style="text-align: right;">Page 33</p> <p>1 that conversation?</p> <p>2 A. I don't remember exactly, but I</p> <p>3 definitely for sure that she not complain, she</p> <p>4 doesn't feel unhappy, and she looks like very</p> <p>5 interested to knowing the culture.</p> <p>6 Q. This was your interpretation of her?</p> <p>7 A. Yes.</p> <p>8 Q. Now, around this same time, Dr. Wu, did</p> <p>9 you issue a discipline to Ruth Briggs?</p> <p>10 A. I issued several disciplinary stuff, but</p> <p>11 I don't remember the timing.</p> <p>12 MR. MUNSHI: Could we have this</p> <p>13 marked as P-6, please.</p> <p>14 (P-6 was marked for identification.)</p> <p>15 BY MR. MUNSHI:</p> <p>16 Q. Dr. Wu, in front of you is a document</p> <p>17 that has been marked as P-6. Please take your</p> <p>18 time and review the document.</p> <p>19 A. Uh-huh.</p> <p>20 Yes.</p> <p>21 Q. And do you see that this is a</p> <p>22 disciplinary report that was issued to Ruth</p> <p>23 Briggs?</p> <p>24 A. Uh-huh.</p>	<p style="text-align: right;">Page 35</p> <p>1 Q. Then under explanation (use reverse side</p> <p>2 if needed) there is one line in there that</p> <p>3 says "Violation of B.11 unprofessional/</p> <p>4 inappropriate conduct."</p> <p>5 Do you see that?</p> <p>6 MS. SATINSKY: Just to be clear for</p> <p>7 the record, it is "Violation of 'Rule' B.11."</p> <p>8 MR. MUNSHI: That's what I meant to</p> <p>9 say.</p> <p>10 BY MR. MUNSHI:</p> <p>11 Q. It says, "Violation of Rule B.11,</p> <p>12 Unprofessional/Inappropriate Conduct." Do you</p> <p>13 see that?</p> <p>14 A. Yes.</p> <p>15 Q. What was the unprofessional/</p> <p>16 inappropriate conduct that Ruth did that</p> <p>17 resulted in this discipline in November of 2011?</p> <p>18 A. I don't recall exactly. It is just a</p> <p>19 series of misconduct that result in this kind of</p> <p>20 disciplinary action. I consult with the dean's</p> <p>21 office and they helped me to identify the level.</p> <p>22 Q. Can you tell me sitting here right now</p> <p>23 what conduct she did that resulted in this</p> <p>24 discipline in November of 2011?</p>
<p style="text-align: right;">Page 34</p> <p>1 Q. Sorry. Please say yes or no.</p> <p>2 A. Yes.</p> <p>3 Q. Is that your signature there on the</p> <p>4 bottom?</p> <p>5 A. Yes.</p> <p>6 Q. And do you see the date of this</p> <p>7 disciplinary report -- well, there are various</p> <p>8 dates here -- but there is a date next to your</p> <p>9 signature up at the top, it looks like</p> <p>10 November 17th, 2011?</p> <p>11 A. Yes.</p> <p>12 Q. And then three lines above that there is</p> <p>13 a typed-in date that says "November 9th, 2011."</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And then down in the middle of the page,</p> <p>17 there is a checkmark next to the words "written</p> <p>18 warning."</p> <p>19 Do you see that?</p> <p>20 A. Yes, I see it.</p> <p>21 Q. And then it says "dates of action,</p> <p>22 November 9th, 2011."</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 36</p> <p>1 A. I don't recall.</p> <p>2 Q. Was the unprofessional/inappropriate</p> <p>3 conduct Ruth saying to you, we are in the United</p> <p>4 States, not in China?</p> <p>5 A. No, it's nothing. Cannot be.</p> <p>6 Q. That had nothing to do with it?</p> <p>7 A. That had nothing to do with it.</p> <p>8 Q. And you don't even recall if she said</p> <p>9 those things; right?</p> <p>10 A. Yes, I don't even recall she said that.</p> <p>11 Q. Is it possible she did say that to you</p> <p>12 and that is why you issued this discipline?</p> <p>13 A. No, definitely not.</p> <p>14 Q. And you understand that she has asserted</p> <p>15 in this lawsuit in federal court that she</p> <p>16 received the discipline for making that comment</p> <p>17 to you, "we're in the United States, not in</p> <p>18 China." Do you understand that?</p> <p>19 A. Yes, I understand.</p> <p>20 Q. And do you dispute her assertion?</p> <p>21 A. Yes, definitely. Because whenever I</p> <p>22 issues these things, it is just a sequence of</p> <p>23 events. I check with our dean's office and</p> <p>24 check with my two associate chair.</p>

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<p style="text-align: right;">Page 37</p> <p>1 Q. With whom did you discuss this specific</p> <p>2 discipline in the dean's office?</p> <p>3 A. Usually Greg and Drew.</p> <p>4 Q. I just want to be super specific here,</p> <p>5 so I don't want to talk about what usually</p> <p>6 happens or what typically happens or what</p> <p>7 generally happens. Just looking specifically at</p> <p>8 this disciplinary report that is <u>P-6</u>.</p> <p>9 A. Uh-huh.</p> <p>10 Q. Do you recall speaking with anybody in</p> <p>11 the dean's office prior to issuing this</p> <p>12 discipline to Ruth Briggs?</p> <p>13 A. I would say yes, because for any</p> <p>14 unwritten disciplinary things, I consult with</p> <p>15 the dean's office. They help me to identify or</p> <p>16 suggest the level of violation.</p> <p>17 Q. Do you recall having any conversation</p> <p>18 with Greg Wacker prior to issuing this</p> <p>19 discipline that is <u>P-6</u> regarding this</p> <p>20 discipline?</p> <p>21 A. I don't remember exact procedure, but I</p> <p>22 always consult with dean's office.</p> <p>23 Q. Again, my question is just going to be</p> <p>24 your specific knowledge. If you don't know, you</p>	<p style="text-align: right;">Page 39</p> <p>1 discipline to Ruth Briggs?</p> <p>2 A. This I don't recall, but I contact HR</p> <p>3 several times about other things.</p> <p>4 Q. And again, we will get to all those</p> <p>5 things.</p> <p>6 A. Yeah.</p> <p>7 Q. You have plenty of time to talk about</p> <p>8 those. I just want to talk about this. Okay?</p> <p>9 A. Yeah.</p> <p>10 Q. Whose decision was it to issue Ruth</p> <p>11 Briggs this discipline at that time?</p> <p>12 A. It's a collective decision.</p> <p>13 Q. Between whom?</p> <p>14 A. Between me and the dean's office.</p> <p>15 Q. Anybody in particular in the dean's</p> <p>16 office? Again, specifically about this</p> <p>17 discipline, not in general.</p> <p>18 A. Against?</p> <p>19 Q. Sorry. Again, not in general, and not</p> <p>20 typically, not usually. I am talking about</p> <p>21 specifically with this discipline, whose</p> <p>22 decision was it to issue Ruth this discipline?</p> <p>23 MS. SATINSKY: Objection. Asked and</p> <p>24 answered. You can answer the question.</p>
<p style="text-align: right;">Page 38</p> <p>1 don't know. That is okay. I just want to be</p> <p>2 clear that we are just talking about this</p> <p>3 specifically, not generally. Okay?</p> <p>4 A. Yeah.</p> <p>5 Q. Do you recall a specific conversation</p> <p>6 with Drew DiMeo about this disciplinary report</p> <p>7 before issuing it to Ruth Briggs?</p> <p>8 A. I don't recall exactly.</p> <p>9 Q. Do you recall a conversation with</p> <p>10 anybody else in the dean's office about issuing</p> <p>11 this discipline to Ruth Briggs?</p> <p>12 A. I would say only two person, Greg and</p> <p>13 Drew.</p> <p>14 Q. But do you have a specific recollection</p> <p>15 of those conversations or not?</p> <p>16 A. I don't recall the content of the</p> <p>17 conversation, but definitely I did have</p> <p>18 conversation with them.</p> <p>19 Q. So you know for sure that you had a</p> <p>20 conversation, but you don't know what the</p> <p>21 content was?</p> <p>22 A. Yeah.</p> <p>23 Q. Did you have any conversations with</p> <p>24 anybody in human resources about issuing this</p>	<p style="text-align: right;">Page 40</p> <p>1 THE WITNESS: I don't recall who.</p> <p>2 But I would say Greg and Drew together.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Who was the first person to raise the</p> <p>5 issue of potentially giving Ruth Briggs a</p> <p>6 discipline at this time?</p> <p>7 A. Again, I don't recall who's the person</p> <p>8 who initiate this, but it's just a sequence of</p> <p>9 this misconduct. Then I contact the dean's</p> <p>10 office. Then they suggest that we can do --</p> <p>11 first verbal and then written.</p> <p>12 Q. Verbal what?</p> <p>13 A. Verbal to inform Ruth. Because we have</p> <p>14 a weekly meeting.</p> <p>15 Q. Verbal to inform Ruth about the</p> <p>16 discipline?</p> <p>17 A. Yeah.</p> <p>18 Q. Or about what?</p> <p>19 A. About whatever the misconduct or her</p> <p>20 performance.</p> <p>21 Q. What verbal conversations did you have</p> <p>22 with Ruth regarding this discipline prior to</p> <p>23 giving it to her, if any?</p> <p>24 A. Again, I don't remember the exact</p>

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<p style="text-align: right;">Page 41</p> <p>1 content, but we usually always give a verbal 2 before the written. 3 Q. And again, I just want to caution you, 4 we are not talking about usually or always. We 5 are just talking specifically about these 6 incidents. 7 MS. SATINSKY: Yes, but he is 8 entitled to testify about his practice. 9 MR. MUNSHI: I know. 10 BY MR. MUNSHI: 11 Q. I just want to be clear. We can get to 12 those things, but right now I am just talking 13 about this discipline. 14 A. Uh-huh. 15 Q. Prior to this discipline you gave to 16 Ruth Briggs, did you ever give her any sort of 17 written warning? 18 A. I don't remember if this is the first 19 one or second written. There are several 20 sequence. And also there are lots of e-mail 21 records. 22 Q. Have you ever seen any e-mail record 23 that specifically discusses why Ruth Briggs was 24 given this specific discipline?</p>	<p style="text-align: right;">Page 43</p> <p>1 date? 2 A. I don't know. 3 Q. Did you input that date into this 4 document? 5 A. Yes, I input the date. 6 Q. Do you recall what, if anything, 7 happened on November 9th, 2011? 8 A. I don't recall any significance of this 9 date. 10 Q. Did you know that Ruth Briggs' birthday 11 is November 10th? 12 A. I don't remember. 13 Q. Do you understand that Ruth Briggs has 14 alleged in this lawsuit that you made an age and 15 sex-based comment to her the day before her 16 birthday on November 9th, 2011? 17 MS. SATINSKY: Objection. Asked and 18 answered. 19 THE WITNESS: I don't know. 20 MS. SATINSKY: Objection to form. 21 You can answer. 22 THE WITNESS: Yeah. 23 I don't know. 24 BY MR. MUNSHI:</p>
<p style="text-align: right;">Page 42</p> <p>1 A. I don't recall. 2 Q. Do you recall seeing any document where 3 it is written down anywhere as to what the 4 unprofessional/inappropriate conduct was that 5 resulted in this specific discipline? 6 A. I don't recall. 7 Q. Do you recall any note to human 8 resources or any note to yourself or any other 9 handwritten notes that you had that specify 10 specifically what is the 11 unprofessional/inappropriate conduct that 12 resulted in this specific discipline? 13 A. I don't recall. 14 Q. The date here up top is November 9th, 15 2011. 16 A. Uh-huh. 17 Q. What is the significance of that date, 18 why is that date there? 19 A. You say November 11th? 20 Q. Up top it says "department computer and 21 information sciences." 22 A. Yeah. 23 Q. "Date, November 9th, 2011." 24 What is the significance of that</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. Did you write "Violation of Rule B.11, 2 unprofessional/inappropriate conduct" in this 3 box? 4 A. I did not write that. 5 Q. Do you have any understanding as to why 6 there is no information on this page as to what 7 the alleged conduct was that resulted in this 8 discipline? 9 A. I do not know. I think that's a 10 practice. We don't write details. 11 Q. Why is that your practice or why is that 12 Temple's practice? 13 MS. SATINSKY: Objection to form. 14 BY MR. MUNSHI: 15 Q. Is that your practice or is that 16 Temple's practice? 17 A. It's not my practice. 18 Q. So whose practice is it? 19 A. I don't remember. Maybe the dean's 20 office. 21 Q. Sitting here right now, do you have any 22 understanding why the specific conduct that 23 resulted in Ruth Briggs' discipline is not 24 listed on this page?</p>

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<p style="text-align: right;">Page 45</p> <p>1 A. As I say, I don't remember exact</p> <p>2 unprofessional/inappropriate conduct, but it's a</p> <p>3 sequence of violation. Then I talk to the</p> <p>4 dean's office, and then they suggest this</p> <p>5 category.</p> <p>6 Q. Who suggested this category to you?</p> <p>7 A. Again, two persons, Greg and Drew.</p> <p>8 Q. And is that in general, or do you have a</p> <p>9 specific recollection of Greg and Drew</p> <p>10 instructing you on the level of the violation?</p> <p>11 A. I don't recall exactly, but I'm almost</p> <p>12 certain that's the way. I would never do that</p> <p>13 kind of thing myself.</p> <p>14 Q. What kind of thing?</p> <p>15 A. I mean to write a violation without</p> <p>16 consulting with the dean's office. I would tell</p> <p>17 them exactly what happened. Then they will help</p> <p>18 me to decide what level.</p> <p>19 Q. And sitting here right now, do you have</p> <p>20 a specific recollection of what you told Greg or</p> <p>21 Drew was the misconduct or unprofessional</p> <p>22 conduct that resulted in this?</p> <p>23 A. I don't recall the content, but it is</p> <p>24 definitely not the one Ruth claimed.</p>	<p style="text-align: right;">Page 47</p> <p>1 A. Again, the procedure is someone typed</p> <p>2 this form, I think the dean's office. Then they</p> <p>3 give me the form. Then we ask Ruth to sign and</p> <p>4 I sign. This is normal procedure.</p> <p>5 Q. And do you recall having a meeting with</p> <p>6 Ruth Briggs where this document was handed to</p> <p>7 her?</p> <p>8 A. I don't recall exactly the format, but</p> <p>9 we always informed Ruth about whatever, whenever</p> <p>10 something happened, we ask and she acknowledge.</p> <p>11 Q. What do you recall her acknowledging</p> <p>12 with regard to this specific discipline?</p> <p>13 A. I don't recall.</p> <p>14 Q. Do you --</p> <p>15 A. But she never complained whenever we</p> <p>16 issue these things to her.</p> <p>17 MS. SATINSKY: And when you</p> <p>18 say "these things," you are referring to?</p> <p>19 THE WITNESS: I'm referring to this</p> <p>20 disciplinary report.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Based on your experience as a manager --</p> <p>23 and you have been a manager over at Temple</p> <p>24 University for how long?</p>
<p style="text-align: right;">Page 46</p> <p>1 MS. SATINSKY: In the complaint.</p> <p>2 THE WITNESS: In the complaint.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Definitely not?</p> <p>5 A. Yeah, definitely not.</p> <p>6 Q. Did you have any conversations with</p> <p>7 anybody in human resources prior to issuing this</p> <p>8 discipline?</p> <p>9 A. I don't recall. As I say, I have</p> <p>10 several conversation with human resource about</p> <p>11 this.</p> <p>12 Q. Do you have a specific recollection of</p> <p>13 informing anybody in human resources about the</p> <p>14 alleged inappropriate or unprofessional conduct</p> <p>15 that Ruth Briggs allegedly did that resulted in</p> <p>16 this discipline?</p> <p>17 A. As I say, I don't recall that.</p> <p>18 Q. How about after this discipline was</p> <p>19 issued, did you have any conversations with</p> <p>20 human resources specifically about what conduct</p> <p>21 resulted in this discipline?</p> <p>22 A. I don't recall.</p> <p>23 Q. Did you issue this discipline to Ruth</p> <p>24 Briggs yourself?</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Seven years as department chair.</p> <p>2 Q. And prior to becoming the department</p> <p>3 chair, did you have people who reported directly</p> <p>4 to you?</p> <p>5 A. Yeah. I work at federal government.</p> <p>6 Q. And it looks like from your resume that</p> <p>7 you started at Temple University in 2009; is</p> <p>8 that right?</p> <p>9 A. Yes.</p> <p>10 MS. SATINSKY: I just want to put on</p> <p>11 the record an objection as to <u>P-1</u> and <u>P-2</u>. We</p> <p>12 will let Dr. Wu testify about this, but Temple's</p> <p>13 document request in this case asked for all</p> <p>14 documents that plaintiff intended offering as</p> <p>15 exhibits at depositions and/or at trial of this</p> <p>16 matter. These requests were propounded on</p> <p>17 May 27, 2016, and we did not receive <u>P-1</u> or <u>P-2</u>.</p> <p>18 Again, I will let Dr. Wu testify</p> <p>19 about these documents and I will permit</p> <p>20 Mr. Munshi to ask questions about them, but I do</p> <p>21 want to put an objection on the record as to the</p> <p>22 use of them.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. So Dr. Wu, you started working over at</p>

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<p style="text-align: right;">Page 49</p> <p>1 Temple University in 2009; is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. And when you started working there, did</p> <p>4 you hold the position of director of the Center</p> <p>5 for Networked Computing?</p> <p>6 A. This is after a few years.</p> <p>7 Q. When you first started working at Temple</p> <p>8 University, did you have any individuals</p> <p>9 reporting directly to you?</p> <p>10 A. All the staff report to me. Ruth joined</p> <p>11 the department maybe a semester later or one</p> <p>12 year later.</p> <p>13 Q. So by the time this discipline was</p> <p>14 issued, you had already been managing employees</p> <p>15 at Temple University for two years; is that</p> <p>16 right?</p> <p>17 A. Yes, correct.</p> <p>18 Q. And as a manager at Temple University,</p> <p>19 do you consider giving somebody a written</p> <p>20 warning an important event?</p> <p>21 A. Oh, yeah, very important.</p> <p>22 Q. It is not something that you would do</p> <p>23 lightly; correct?</p> <p>24 A. It's probably the first time in my life</p>	<p style="text-align: right;">Page 51</p> <p>1 A. Yes, because for all the events relating</p> <p>2 to Ruth, I would tell my two associates.</p> <p>3 Q. What do you specifically recall</p> <p>4 discussing with Dr. Kwanty about Ruth Briggs'</p> <p>5 alleged conduct that resulted in this specific</p> <p>6 discipline?</p> <p>7 A. As I say, I don't recall, because she</p> <p>8 has so many misconducts over the years.</p> <p>9 Q. Do you recall ever stating in writing to</p> <p>10 Dr. Kwanty, I am going to give Ruth Briggs</p> <p>11 discipline because of something?</p> <p>12 A. No, there's no written things.</p> <p>13 Everything is through conversation.</p> <p>14 Q. How about Justin Shi?</p> <p>15 A. It's the same.</p> <p>16 Q. Same?</p> <p>17 A. Yeah. We have weekly meetings.</p> <p>18 Q. And just so the record is clear, my</p> <p>19 question is, do you have a specific recollection</p> <p>20 of ever putting in writing to Justin Shi the</p> <p>21 reasons why this discipline was issued to Ruth</p> <p>22 Briggs at this time?</p> <p>23 A. There is no written.</p> <p>24 But if there is a need, we can dig</p>
<p style="text-align: right;">Page 50</p> <p>1 give that kind of warning.</p> <p>2 Q. The first time to any employee?</p> <p>3 A. To any employee, yes. So I consult with</p> <p>4 dean's office, my associates, many, many times</p> <p>5 before we issue such written.</p> <p>6 Q. And when you say "associates," who are</p> <p>7 you referring to?</p> <p>8 A. Associate chair. Actually, these two</p> <p>9 persons most important. They know all the</p> <p>10 details of our conversation and because we have</p> <p>11 a weekly meeting. I spent lots of time to</p> <p>12 discuss about Ruth.</p> <p>13 Q. Who is the associate chair?</p> <p>14 A. One is Gene Kwanty, G-E-N-E,</p> <p>15 K-W-A-N-T-Y. Another one is Justin Shi, last</p> <p>16 name S-H-I.</p> <p>17 These are the two most important</p> <p>18 persons because they know all the day-to-day</p> <p>19 business of me and the department and the</p> <p>20 disruption of Ruth to the department.</p> <p>21 Q. Do you have a specific recollection of</p> <p>22 having any conversation with Dr. Kwanty about</p> <p>23 the conduct that Ruth Briggs allegedly did that</p> <p>24 resulted in this discipline?</p>	<p style="text-align: right;">Page 52</p> <p>1 out all the e-mails surrounding the events</p> <p>2 before that between me and Ruth.</p> <p>3 Q. I think we have.</p> <p>4 A. Yeah.</p> <p>5 Q. Did you ever learn, Dr. Wu, from Greg</p> <p>6 Wacker -- sorry. Let me take a step back.</p> <p>7 A. Yeah.</p> <p>8 Q. What is Greg Wacker's position at this</p> <p>9 time?</p> <p>10 MS. SATINSKY: At what time?</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. November of 2011?</p> <p>13 A. He's manager, financial manager. But I</p> <p>14 think he's also in charge of all the staff,</p> <p>15 college staff.</p> <p>16 Q. Did he report directly to you?</p> <p>17 A. No. He's dean's level -- I mean dean's</p> <p>18 office.</p> <p>19 Q. Did Ruth Briggs have any reporting</p> <p>20 relationship to Greg Wacker?</p> <p>21 A. Not officially. Greg is like in charge</p> <p>22 of all the staff. So indirectly he has this</p> <p>23 responsibility.</p> <p>24 Q. Is Greg Wacker still employed by Temple,</p>

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<p style="text-align: right;">Page 53</p> <p>1 do you know?</p> <p>2 A. Yes. I think officially he's in charge</p> <p>3 of all staff member, hiring in the college.</p> <p>4 Q. And Ruth Briggs was considered a staff</p> <p>5 member?</p> <p>6 A. Oh, yes.</p> <p>7 Q. Did you ever learn from Greg Wacker that</p> <p>8 Ruth Briggs told him that you made a comment to</p> <p>9 her about retiring at the age of 55?</p> <p>10 A. I don't recall. This is the first time</p> <p>11 I see this, discrimination.</p> <p>12 Q. This lawsuit, you mean?</p> <p>13 A. Yes, lawsuit.</p> <p>14 Q. Based on your experience as a manager at</p> <p>15 Temple for several years, if you gave a written</p> <p>16 warning to somebody for opposing a sex-based or</p> <p>17 age-based comment that you made, would you</p> <p>18 understand that conduct of issuing that</p> <p>19 discipline to be a violation of Temple's</p> <p>20 policies?</p> <p>21 MS. SATINSKY: Objection to form.</p> <p>22 You can answer.</p> <p>23 THE WITNESS: Yeah, definitely.</p> <p>24 BY MR. MUNSHI:</p>	<p style="text-align: right;">Page 55</p> <p>1 MR. MUNSHI: I am going to point</p> <p>2 him.</p> <p>3 MS. SATINSKY: Dr. Wu, I want you to</p> <p>4 read the whole thing before you testify about</p> <p>5 it.</p> <p>6 THE WITNESS: Okay. It may take a</p> <p>7 few minutes to read.</p> <p>8 (Pause.)</p> <p>9 It is backward, right?</p> <p>10 BY MR. MUNSHI:</p> <p>11 Q. Right. The oldest e-mail would be in</p> <p>12 the back, so if you want to read from back to</p> <p>13 front, that's fine.</p> <p>14 A. (Pause.)</p> <p>15 Okay.</p> <p>16 Q. Do you know who Cameron Etezady is?</p> <p>17 A. I don't know.</p> <p>18 Q. I am going to direct your attention to</p> <p>19 the third page of <u>P-7</u>. And there is an e-mail</p> <p>20 that starts in the middle of that page, it says,</p> <p>21 "On February 10, 2013, 10:32 p.m., Ruth Briggs</p> <p>22 wrote."</p> <p>23 Do you see that in the middle of the</p> <p>24 page?</p>
<p style="text-align: right;">Page 54</p> <p>1 Q. At any point when Ruth Briggs was</p> <p>2 working under you, did you have a conversation</p> <p>3 with her about your retirement?</p> <p>4 A. Never. I actually encourage her to</p> <p>5 enjoy life, to travel more, so to be less</p> <p>6 stressful.</p> <p>7 Q. What do you recall, is that one</p> <p>8 conversation or several?</p> <p>9 A. Multiple conversations. I always</p> <p>10 suggest her, just be relaxed and then do some</p> <p>11 vacation. Then she always say that she has</p> <p>12 money issue.</p> <p>13 MR. MUNSHI: Let's have this marked</p> <p>14 as <u>P-7</u>.</p> <p>15 (<u>P-7</u> was marked for identification.)</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. Dr. Wu, in front of you is an e-mail</p> <p>18 chain that is several pages long, Bates stamped</p> <p>19 Briggs 64 to 67, between Ruth Briggs and an</p> <p>20 individual named Cameron Etezady.</p> <p>21 Do you know who Cameron Etezady is?</p> <p>22 MS. SATINSKY: Do you want him to</p> <p>23 testify about this document? If you do, I would</p> <p>24 like him to read it first.</p>	<p style="text-align: right;">Page 56</p> <p>1 A. Yes.</p> <p>2 Q. And the third paragraph of her e-mail</p> <p>3 states, the first sentence is, "On numerous</p> <p>4 occasions" -- and I am sorry, I may pronounce</p> <p>5 your name wrong. Can you pronounce your name</p> <p>6 for me?</p> <p>7 A. Yes. Jie Wu.</p> <p>8 Q. It says, "On numerous occasions, Jie Wu</p> <p>9 has mentioned the professional lives of women my</p> <p>10 age (58) in China are over, and I wrote it off</p> <p>11 to cultural differences."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Do you dispute what Ruth Briggs wrote in</p> <p>15 this e-mail to Cameron Etezady that you</p> <p>16 mentioned on numerous occasions that the</p> <p>17 professional lives of women are over?</p> <p>18 A. I just recall one conversation, which is</p> <p>19 friendly conversation after my travel.</p> <p>20 Q. And in that friendly conversation after</p> <p>21 your travel, did you mention that the</p> <p>22 professional lives of women her age (58) in</p> <p>23 China are over?</p> <p>24 A. No, because I don't even know her age.</p>

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<p style="text-align: right;">Page 57</p> <p>1 How can I say 58?</p> <p>2 Q. Take out the age part of it where the</p> <p>3 specific number is 58.</p> <p>4 Did you mention to her during that</p> <p>5 friendly conversation after your travel that the</p> <p>6 professional lives of women of a certain age are</p> <p>7 over?</p> <p>8 A. Again, I don't recall the exact wording.</p> <p>9 I would not say professional life. I just say</p> <p>10 lots of women retire. Not just women. Males</p> <p>11 are retired.</p> <p>12 Q. In that conversation you had with Ruth</p> <p>13 Briggs, were you also talking about men or were</p> <p>14 you just talking about woman?</p> <p>15 A. I think I focus more on women, but I</p> <p>16 don't remember exact information. I would never</p> <p>17 say about the age, like 58.</p> <p>18 Q. You are talking about the specific</p> <p>19 number?</p> <p>20 A. Yeah. I don't recall this. I would not</p> <p>21 say this specific number.</p> <p>22 Q. Putting aside the specific number, age,</p> <p>23 which you may not have known --</p> <p>24 A. Uh-huh.</p>	<p style="text-align: right;">Page 59</p> <p>1 financial stability to be able to travel when I</p> <p>2 felt defensive and offended."</p> <p>3 Do you see that?</p> <p>4 A. Yeah, I saw that.</p> <p>5 Q. And earlier, just a few minutes ago, you</p> <p>6 were telling me that you did have conversations</p> <p>7 with Ruth Briggs where you encouraged her to</p> <p>8 travel; correct?</p> <p>9 A. Yes.</p> <p>10 Q. In those conversations where you</p> <p>11 encouraged her to travel, you discussed her</p> <p>12 financial situation; correct?</p> <p>13 A. No, we never discussed financial</p> <p>14 situation. I just, from my point of view, I</p> <p>15 just feel sorry for her. I just say this may</p> <p>16 change your life if you take some time off, I</p> <p>17 mean to do some travel, be less stressful. It's</p> <p>18 a very friendly environment.</p> <p>19 Q. Did she mention anything to you anything</p> <p>20 about finances when you were having</p> <p>21 conversations about travel?</p> <p>22 A. She mentioned because she says that she</p> <p>23 still owe money for college.</p> <p>24 Q. And in the conversations where you</p>
<p style="text-align: right;">Page 58</p> <p>1 Q. -- you are not disputing with me that a</p> <p>2 conversation about retirement is age-based;</p> <p>3 right?</p> <p>4 MS. SATINSKY: Objection to form.</p> <p>5 THE WITNESS: In China, yes, but it</p> <p>6 has nothing to do with US. It is totally out of</p> <p>7 context.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. Just specifically this line that she</p> <p>10 wrote here to Cameron, that on numerous</p> <p>11 occasions, Jie Wu mentioned that the</p> <p>12 professional lives of women (58) in China are</p> <p>13 over," you are saying that did not happen;</p> <p>14 correct?</p> <p>15 MS. SATINSKY: Objection. Asked and</p> <p>16 answered. You can answer it one more time.</p> <p>17 THE WITNESS: I just said, we had a</p> <p>18 conversation about it, but it is a casual</p> <p>19 conversation after my trip about the culture.</p> <p>20 It's nothing to do with her.</p> <p>21 BY MR. MUNSHI:</p> <p>22 Q. Her next sentence in this e-mail to</p> <p>23 Cameron is, "It was when he would make a comment</p> <p>24 that referenced my age and failure to attain the</p>	<p style="text-align: right;">Page 60</p> <p>1 encouraged her to travel, did you ever make a</p> <p>2 comment as she writes here to Cameron, a comment</p> <p>3 that referenced her age, or do you dispute what</p> <p>4 she wrote here?</p> <p>5 MS. SATINSKY: Objection. Asked and</p> <p>6 answered numerous times. You can answer his</p> <p>7 question one more time.</p> <p>8 THE WITNESS: This is nothing to do</p> <p>9 with age. Just said you need to take a</p> <p>10 vacation, be more relaxed. Be too stressful.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. I want to be crystal clear here just so</p> <p>13 the record is clear.</p> <p>14 When she writes here that you would</p> <p>15 make a comment that referenced her age in</p> <p>16 connection with travel, you dispute that;</p> <p>17 correct?</p> <p>18 A. Yes, I dispute it.</p> <p>19 Q. When she writes here to Cameron that on</p> <p>20 numerous occasions you mentioned that</p> <p>21 professional lives of women her age are over,</p> <p>22 did you think she was just making that up?</p> <p>23 MS. SATINSKY: Objection to form.</p> <p>24 THE WITNESS: It's not making up. I</p>

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<p style="text-align: right;">Page 61</p> <p>1 do say that, but it's totally different context. 2 I talk about fact in China womens retire certain 3 age. It is just one conversation. It is 4 nothing to do with what happened in US. 5 BY MR. MUNSHI: 6 Q. And when she writes here that you would 7 make a comment that referenced her age in 8 connection with travel, do you think she's 9 making that up? 10 MS. SATINSKY: Objection to form. 11 THE WITNESS: I would not relate age 12 to travel. 13 BY MR. MUNSHI: 14 Q. But you see that she wrote that? 15 A. Yeah, I know. 16 Q. Do you think she is making it up to 17 Cameron? 18 MS. SATINSKY: Objection to form. 19 THE WITNESS: Or maybe she 20 misunderstood. 21 BY MR. MUNSHI: 22 Q. Do you think she's lying? 23 MS. SATINSKY: Objection to form. 24 Asked and answered. Don't answer that question.</p>	<p style="text-align: right;">Page 63</p> <p>1 wrote to Cameron, do you think she's lying when 2 she wrote it? 3 A. It's just not correct. 4 Q. Do you know who a woman named Sandra 5 Foehl is, F-O-E-H-L? 6 A. Sandra Foehl, I don't recall. 7 MS. SATINSKY: Can we take a break? 8 MR. MUNSHI: Sure. Let's take five. 9 (Recess.) 10 BY MR. MUNSHI: 11 Q. Dr. Wu, I was about to ask you about 12 Sandra Foehl, F-O-E-H-L. Are you familiar with 13 her in any way? 14 A. I don't recall. 15 Q. Are you familiar at Temple with an 16 office called the EEO office? 17 A. I think there is one, yeah. I don't 18 have any contact. 19 Q. Are you familiar with the phrase "equal 20 employment opportunity office" at Temple? 21 A. Oh, yeah. 22 Q. You know the name of that office? 23 A. Yeah. 24 Q. What is that office, as far as you know?</p>
<p style="text-align: right;">Page 62</p> <p>1 He just answered it. 2 THE WITNESS: Yeah. 3 MR. MUNSHI: He just said maybe she 4 misunderstood, which is fine. I am asking a 5 more specific question. 6 BY MR. MUNSHI: 7 Q. Do you think she is lying? 8 MS. SATINSKY: Again, asked and 9 answered. 10 THE WITNESS: So I don't need to 11 answer, right? 12 MS. SATINSKY: You can answer the 13 question one more time, but that's it. After 14 this, don't answer again. 15 THE WITNESS: Yeah, because I say 16 that I don't relate age and this travel. I 17 would not say those kind of things. 18 BY MR. MUNSHI: 19 Q. And I understand you have said that 20 several times. 21 A. Yeah, yeah. 22 Q. I understand that. So I am not asking 23 you that question as to whether you did it. I 24 am asking you based on your reading of what she</p>	<p style="text-align: right;">Page 64</p> <p>1 A. It is just to ensure that equal 2 opportunity, when we hire faculty, we make sure 3 that we go through that office. 4 Q. Did you have any contact with the EEO 5 office regarding Ruth Briggs? 6 A. I don't recall. 7 Q. Did you ever learn that Ruth Briggs told 8 the EEO office anything about you? 9 A. I don't -- 10 MS. SATINSKY: Prior to this 11 litigation? 12 BY MR. MUNSHI: 13 Q. Prior to her termination? 14 A. I do not. I do not know. 15 Q. Did you ever learn prior to the 16 termination that Ruth Briggs said anything to 17 the EEO office about age comments that you 18 allegedly made to her? 19 MS. SATINSKY: Objection to form. 20 THE WITNESS: I do not know. 21 MR. MUNSHI: <u>P-8</u>. 22 (<u>P-8</u> was marked for identification.) 23 BY MR. MUNSHI: 24 Q. In front of you, Dr. Wu, is a document</p>

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<p style="text-align: right;">Page 65</p> <p>1 that has been marked as P-8. It is two e-mails</p> <p>2 here. Feel free to review it and let me know</p> <p>3 when you are done.</p> <p>4 A. (Pause.)</p> <p>5 Okay. I have one question. So she</p> <p>6 says that not relevant to following tactic for</p> <p>7 male. Threaten me with dismissal for lack of</p> <p>8 loyalty to him.</p> <p>9 Who she refer to?</p> <p>10 Q. Let me go through my questions here.</p> <p>11 Okay?</p> <p>12 A. Okay.</p> <p>13 Q. The bottom e-mail from Ruth Briggs to</p> <p>14 Sandra Foehl dated September 9th, 2012, do you</p> <p>15 see that e-mail?</p> <p>16 A. Yes.</p> <p>17 Q. The third paragraph up from the bottom</p> <p>18 starts with the phrase, "regarding our</p> <p>19 discussion related to Dr. Wu's comments about my</p> <p>20 age."</p> <p>21 Do you see that?</p> <p>22 A. Uh-huh.</p> <p>23 Q. Sorry, please just verbalize for the</p> <p>24 record.</p>	<p style="text-align: right;">Page 67</p> <p>1 A. Again, I talked to several people in HR.</p> <p>2 I think she's one of them.</p> <p>3 Q. Do you recall the names of anybody else</p> <p>4 in human resources who you spoke with about Ruth</p> <p>5 Briggs?</p> <p>6 A. Either Deidre or Sharon, yeah.</p> <p>7 Q. Sharon Boyle?</p> <p>8 A. Yes.</p> <p>9 Q. Anybody else besides Deidre and Sharon</p> <p>10 Boyle who you recall speaking with in human</p> <p>11 resources about Ruth Briggs prior to her</p> <p>12 termination?</p> <p>13 A. I don't recall. I only remember these</p> <p>14 two names.</p> <p>15 Q. Did Deidre Walton ever tell you that</p> <p>16 Ruth Briggs had conversations with her about</p> <p>17 you?</p> <p>18 A. She didn't tell me.</p> <p>19 Q. Did Sharon Boyle ever tell you that</p> <p>20 Miss Briggs had conversations with her about</p> <p>21 you?</p> <p>22 A. No, she didn't.</p> <p>23 Q. Did you ever learn from Greg Wacker that</p> <p>24 Miss Briggs had gone to human resources or the</p>
<p style="text-align: right;">Page 66</p> <p>1 A. Yes.</p> <p>2 Q. And that reference here from Ruth Briggs</p> <p>3 in P-8, comments related to her age from you, do</p> <p>4 you dispute that you ever made comments to her</p> <p>5 about her age as listed here?</p> <p>6 MS. SATINSKY: Objection. Asked and</p> <p>7 answered.</p> <p>8 You can answer the question.</p> <p>9 THE WITNESS: Yeah, I don't recall</p> <p>10 my comments on age. It is just, again, out of</p> <p>11 context, I cannot recall anything.</p> <p>12 BY MR. MUNSHI:</p> <p>13 Q. Do you recall any comments about her age</p> <p>14 in a different context?</p> <p>15 A. No. I would never have the official</p> <p>16 occasion to discuss her age.</p> <p>17 Q. Do you know a woman named Deidre Walton?</p> <p>18 A. Yeah, Deidre I think sound familiar.</p> <p>19 Maybe HR.</p> <p>20 Q. In human resources?</p> <p>21 A. Yeah.</p> <p>22 Q. Prior to Ruth Briggs' termination, did</p> <p>23 you have any conversations with Deidre Walton</p> <p>24 about Ruth Briggs?</p>	<p style="text-align: right;">Page 68</p> <p>1 EEO office or legal about you?</p> <p>2 MS. SATINSKY: Prior to the end of</p> <p>3 her employment at Temple?</p> <p>4 MR. MUNSHI: Correct.</p> <p>5 THE WITNESS: No, I did not know.</p> <p>6 BY MR. MUNSHI:</p> <p>7 Q. Did you ever learn from Drew DiMeo that</p> <p>8 Ruth Briggs had gone to human resources, EEO or</p> <p>9 legal prior to her termination about you?</p> <p>10 MS. SATINSKY: Objection to form.</p> <p>11 You can answer.</p> <p>12 THE WITNESS: He did not.</p> <p>13 BY MR. MUNSHI:</p> <p>14 Q. Prior to joining Temple, you had worked</p> <p>15 at a different university; right?</p> <p>16 A. Yes.</p> <p>17 Q. Would you say that you have been</p> <p>18 managing employees in one capacity or another</p> <p>19 for over 20 years?</p> <p>20 A. Employee sounds like research associate,</p> <p>21 TA's in some programs, and at the National</p> <p>22 Science Foundation I managed the whole program.</p> <p>23 Q. And in the year 2014, within your prior</p> <p>24 capacity as the chair, you were managing around</p>

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<p style="text-align: right;">Page 69</p> <p>1 50 people or so?</p> <p>2 A. Correct.</p> <p>3 Q. And in your capacity as a manager for</p> <p>4 all these years, are you familiar with Title VII</p> <p>5 of the Civil Rights Act of 1964?</p> <p>6 MS. SATINSKY: Objection to form.</p> <p>7 You can answer the question.</p> <p>8 THE WITNESS: I have heard that.</p> <p>9 BY MR. MUNSHI:</p> <p>10 Q. What have you heard?</p> <p>11 A. The title.</p> <p>12 MS. SATINSKY: I don't want you to</p> <p>13 testify about anything you might have learned</p> <p>14 from an attorney.</p> <p>15 THE WITNESS: Uh-huh.</p> <p>16 MS. SATINSKY: But anything that you</p> <p>17 have learned from someone other than an</p> <p>18 attorney, you can testify about.</p> <p>19 THE WITNESS: Uh-huh.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. So just to clarify my question, it is</p> <p>22 within your capacity as a manager, not in your</p> <p>23 capacity in litigation.</p> <p>24 A. Yeah, yeah.</p>	<p style="text-align: right;">Page 71</p> <p>1 state laws that protect individuals from certain</p> <p>2 types of discrimination?</p> <p>3 MS. SATINSKY: Objection to form.</p> <p>4 THE WITNESS: Yes, I know that.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. Did you ever receive training from</p> <p>7 Temple University about employment laws?</p> <p>8 A. Oh, yeah, I did all kinds of training</p> <p>9 online, on meetings.</p> <p>10 Q. What kinds of meetings?</p> <p>11 A. Like when I entered, human resource meet</p> <p>12 with me. I don't remember exact content. But</p> <p>13 each semester we have to pass certain classes,</p> <p>14 online classes. But discrimination definitely</p> <p>15 is the one we know, we shouldn't do that.</p> <p>16 Q. And for the online classes, did they</p> <p>17 discuss discrimination in the workplace?</p> <p>18 A. I'm pretty sure, yes.</p> <p>19 Q. And in those online classes, did they</p> <p>20 discuss retaliation in the workplace?</p> <p>21 A. I don't recall exactly. Obviously you</p> <p>22 cannot retaliate. You shouldn't.</p> <p>23 Q. And are you familiar within your</p> <p>24 capacity as a manager at Temple that Temple has</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. What have you heard about Title VII of</p> <p>2 the Civil Rights Act of 1964?</p> <p>3 A. I heard this, but I don't know the</p> <p>4 detail.</p> <p>5 Q. And again, within your capacity as a</p> <p>6 manager -- not litigation --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- are you familiar with the Age</p> <p>9 Discrimination in Employment Act?</p> <p>10 MS. SATINSKY: Objection to form.</p> <p>11 You can answer.</p> <p>12 THE WITNESS: I know. I know that</p> <p>13 we should not have this age discrimination.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. Okay. And within your capacity as a</p> <p>16 manager in Pennsylvania, are you familiar with</p> <p>17 the Pennsylvania Human Relations Act?</p> <p>18 MS. SATINSKY: Objection to form.</p> <p>19 You can answer.</p> <p>20 THE WITNESS: I am not very familiar</p> <p>21 with that, not familiar.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Are you generally familiar within your</p> <p>24 capacity as a manager that there are federal and</p>	<p style="text-align: right;">Page 72</p> <p>1 anti-discrimination and anti-retaliation</p> <p>2 policies?</p> <p>3 A. Yes.</p> <p>4 Q. Do you consider these policies of</p> <p>5 anti-discrimination and anti-retaliation</p> <p>6 important?</p> <p>7 A. Oh, yeah, very important.</p> <p>8 Q. Why?</p> <p>9 A. The reason that we should not</p> <p>10 discriminate people based on age, gender.</p> <p>11 Q. In your capacity as a manager, is it</p> <p>12 your understanding that even though we have</p> <p>13 these federal and state laws and policies, that</p> <p>14 sometimes there is discrimination in the</p> <p>15 workplace?</p> <p>16 MS. SATINSKY: Objection to form.</p> <p>17 THE WITNESS: Yes, because I heard</p> <p>18 from different news and other sources. There</p> <p>19 are cases of discrimination.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. And similarly within your capacity as a</p> <p>22 manager, even though we have these federal and</p> <p>23 state laws and policies, do you understand that</p> <p>24 unlawful retaliation sometimes does take place?</p>

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<p style="text-align: right;">Page 73</p> <p>1 MS. SATINSKY: Objection to form.</p> <p>2 THE WITNESS: Yes, I can imagine so.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Do you have an understanding as a</p> <p>5 manager that somebody's age or somebody's sex is</p> <p>6 considered a protected characteristic?</p> <p>7 MS. SATINSKY: Objection to form.</p> <p>8 THE WITNESS: Yeah, I understand.</p> <p>9 BY MR. MUNSHI:</p> <p>10 Q. Within your capacity as a manager, what</p> <p>11 does that mean to you, a protected</p> <p>12 characteristic?</p> <p>13 MS. SATINSKY: Objection to form.</p> <p>14 THE WITNESS: Oh, I just say that we</p> <p>15 should not discriminate people based on age and</p> <p>16 gender and other things.</p> <p>17 BY MR. MUNSHI:</p> <p>18 Q. Did Ruth Briggs ever complain to you</p> <p>19 that she didn't feel like you were treating her</p> <p>20 fairly?</p> <p>21 A. I don't recall.</p> <p>22 Q. Has any employee ever complained to you</p> <p>23 that you are not treating them fairly?</p> <p>24 A. No, I never receive any complaint from</p>	<p style="text-align: right;">Page 75</p> <p>1 A. Correct.</p> <p>2 Q. And the last sentence in the first</p> <p>3 paragraph, the big paragraph that Ruth Briggs</p> <p>4 writes to you, she says, "While I have no</p> <p>5 defense against anything that comes my way, it</p> <p>6 would be nice to have fairness and treatment and</p> <p>7 equal applying standards apply for staff</p> <p>8 members."</p> <p>9 Do you see that?</p> <p>10 A. Which? Oh, yeah, yeah, I see it.</p> <p>11 Q. Are you with me, the last sentence of</p> <p>12 the first paragraph?</p> <p>13 A. Yeah, I see that.</p> <p>14 Q. Did you ever talk to Ruth Briggs about</p> <p>15 what she wrote here in that sentence?</p> <p>16 A. I don't recall exactly the conversation,</p> <p>17 but I almost talk to her daily on various</p> <p>18 things.</p> <p>19 Q. Do you have a recollection of talking</p> <p>20 with Ruth Briggs about why she felt this way?</p> <p>21 A. I don't recall.</p> <p>22 Q. Did you ever disclose to human resources</p> <p>23 that she wrote to you about fairness and</p> <p>24 treatment and equal applying standards?</p>
<p style="text-align: right;">Page 74</p> <p>1 faculty or from staff.</p> <p>2 Q. Do you think that would be something you</p> <p>3 would remember if Ruth Briggs did in fact</p> <p>4 complain to you?</p> <p>5 A. Oh, yeah, yeah. Because I feel very</p> <p>6 proud after working seven years no one made any</p> <p>7 complaint to me.</p> <p>8 Q. Did Ruth Briggs ever complain to you</p> <p>9 that she felt like you were treating her</p> <p>10 differently than other staff members?</p> <p>11 A. She never directly complained to me.</p> <p>12 MR. MUNSHI: Let's have this</p> <p>13 document marked as P-9, please.</p> <p>14 (P-9 was marked for identification.)</p> <p>15 BY MR. MUNSHI:</p> <p>16 Q. Dr. Wu, in front of you is a document</p> <p>17 that has been marked as P-9. Please take time</p> <p>18 to read it.</p> <p>19 A. (Pause.)</p> <p>20 Okay.</p> <p>21 Q. On the first page of P-9, there is an</p> <p>22 e-mail from Ruth Briggs to you dated</p> <p>23 November 9th, 2010.</p> <p>24 Do you see that?</p>	<p style="text-align: right;">Page 76</p> <p>1 A. I don't recall.</p> <p>2 Q. Don't you think that is something that</p> <p>3 you should have reported to human resources if</p> <p>4 you have a staff member writing to you about</p> <p>5 fairness and treatment and equal applying</p> <p>6 standards?</p> <p>7 MS. SATINSKY: Objection to form.</p> <p>8 Mischaracterizes testimony.</p> <p>9 You can answer the question if you</p> <p>10 understand it.</p> <p>11 THE WITNESS: Yeah, because I don't</p> <p>12 think that's the level that I should report to</p> <p>13 to HR. Because all I ask is just to prove</p> <p>14 reasons, and she didn't do the work and then</p> <p>15 come up with all kinds of excuses.</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. Just focusing in on what she wrote to</p> <p>18 you, did you feel that it wasn't necessary to</p> <p>19 inform human resources that you had a staff</p> <p>20 member, Ruth Briggs, who wrote to you about her</p> <p>21 treatment from you?</p> <p>22 MS. SATINSKY: Objection to form.</p> <p>23 Mischaracterizes testimony.</p> <p>24 You can answer the question.</p>

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<p style="text-align: right;">Page 77</p> <p>1 THE WITNESS: Again, I don't think 2 that it reach a level for me to report to HR for 3 this incident. 4 BY MR. MUNSHI: 5 Q. Had any other employee prior to November 6 of 2010 ever written to you or said to you or 7 commented to you anything about fairness and 8 treatment in the workplace? 9 A. I don't recall. 10 Q. Prior to November of 2010, had any other 11 employee reporting to you wrote to you, said to 12 you, or commented to you about equal applying 13 standards apply for all staff members? 14 MS. SATINSKY: Objection to form. 15 THE WITNESS: Again, I don't think 16 so, because there's no other staff has problem 17 like Ruth's. 18 BY MR. MUNSHI: 19 Q. Did you talk with Greg Wacker about Ruth 20 Briggs' e-mail to you that we are looking at, 21 <u>P-9</u>? 22 A. Again, I don't recall. I have many 23 conversations with Greg about Ruth. 24 Q. Do you recall a conversation with</p>	<p style="text-align: right;">Page 79</p> <p>1 A. Yes. I just feel that it's her opinion 2 about the fairness and the standard. 3 Q. Was that upsetting to you to have a 4 staff member for the first time raising an issue 5 with you about fairness in the workplace? 6 A. No, it's not upsetting. I'm not really 7 upsetting about her as a person. Just upsetting 8 her performance. 9 Q. So the fact that she wrote this e-mail 10 to you, her manager, about how she feels she is 11 being treated, that didn't upset you? 12 A. Again, she upset me on many other 13 things. I don't recall this stand out. 14 Q. Were you surprised to get an e-mail from 15 her where she talks about her treatment in the 16 workplace? 17 MS. SATINSKY: Objection to form. 18 THE WITNESS: Obviously there was 19 some surprise, but not to the extent that I 20 report to HR. 21 BY MR. MUNSHI: 22 Q. Did you think that she had any basis to 23 complain to you about how the standards are 24 being applied to her?</p>
<p style="text-align: right;">Page 78</p> <p>1 Dr. Kwanty about Ruth Briggs' e-mail to you that 2 she writes in here in <u>P-9</u> about her treatment in 3 the workplace? 4 MS. SATINSKY: Objection to form. 5 THE WITNESS: Again, I don't recall. 6 BY MR. MUNSHI: 7 Q. How about Justin Shi? 8 A. I don't recall. 9 Q. How did it make you feel to receive an 10 e-mail from Ruth Briggs where she talks to you 11 about fairness and treatment and equal applying 12 standards applied for staff members? 13 A. I feel that I gave her simple work. She 14 didn't complete it. And she not giving the 15 truth that she complete it. She told me that 16 she complete it, but never sent the result back 17 to me. Then she complain all this problem with 18 computer. That's her practice always, the 19 tactic. 20 Instead of admitting the errors or 21 problems, she comes up with all kinds of 22 excuses. 23 Q. And did you consider her e-mail to you 24 in November of 2010 explaining an excuse?</p>	<p style="text-align: right;">Page 80</p> <p>1 MS. SATINSKY: Objection to form. 2 THE WITNESS: It's no surprise 3 because she's always complaining different 4 things in her life, her miserable life. She 5 will tell me about the family. We all feel 6 sympathetic to her, for her. 7 BY MR. MUNSHI: 8 Q. You called it her opinion. When she 9 wrote her opinion that we just talked about, the 10 last sentence in Paragraph 1, do you think that 11 that is how she really felt or do you think she 12 is just lying? 13 MS. SATINSKY: Objection to form. 14 THE WITNESS: I think she felt. I'm 15 not saying she's lying. It's her interpretation 16 about fairness. 17 BY MR. MUNSHI: 18 Q. So thinking that she's telling you her 19 honest opinion and thoughts about how she is 20 being treated by you in the workplace, did you 21 feel the need to follow up with her or anybody 22 about this? 23 A. Oh, yeah. 24 MS. SATINSKY: Objection to form.</p>

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<p style="text-align: right;">Page 81</p> <p>1 Mischaracterizes testimony. 2 You can answer. 3 THE WITNESS: Yeah. We -- as I say, 4 we spend about six year or five year, the whole 5 department, almost every week try to help her. 6 I call HR several times. Seek help from the 7 dean's office to help her. And we have numerous 8 conversation and documented. Instead of firing 9 her, we just tried to help her. 10 BY MR. MUNSHI: 11 Q. And when you said "numerous 12 conversations," are you talking about with human 13 resources or with Ruth? 14 A. With all. With human resources, with 15 dean's office, with Ruth. 16 Q. So in your conversations with Ruth, did 17 you talk about her feelings that she wrote in 18 <u>P-9</u>? 19 A. I don't recall exactly the content, but 20 we talk a wide range of things, how we can help 21 her. 22 Q. And in all your conversations with human 23 resources, over all the years where you are 24 talking about how do we help Ruth Briggs --</p>	<p style="text-align: right;">Page 83</p> <p>1 Asked and answered. 2 THE WITNESS: Yeah, I would not say 3 this is accurate. 4 BY MR. MUNSHI: 5 Q. Is it upsetting to you as a manager to 6 have a staff member write things to you that are 7 inaccurate about the workplace? 8 MS. SATINSKY: Objection. Asked and 9 answered. Rahul, I've given you a lot of leeway 10 on questions that have been asked more than 11 once. 12 MR. MUNSHI: Slightly different. 13 MS. SATINSKY: Doctor, you can 14 answer this question one more time. 15 THE WITNESS: As I say, I don't even 16 recall that. It cannot be that upsetting to me. 17 BY MR. MUNSHI: 18 Q. Do you feel like you treat all your 19 direct reports equally regardless of age or 20 gender? 21 A. Oh, definitely. Because we have lots of 22 staff member. A couple of staff much older than 23 her. 24 Q. Do you feel like you treat all her staff</p>
<p style="text-align: right;">Page 82</p> <p>1 A. Yeah. 2 Q. -- did you ever raise this issue with 3 them that she wrote to me about fairness and 4 treatment? 5 MS. SATINSKY: Objection to form. 6 THE WITNESS: I don't recall. 7 BY MR. MUNSHI: 8 Q. Any reason why you wouldn't raise that? 9 MS. SATINSKY: Objection to form. 10 THE WITNESS: Because we don't feel, 11 I don't feel that there is a mistreatment. 12 BY MR. MUNSHI: 13 Q. Did you consider what she writes here to 14 be a false accusation? 15 MS. SATINSKY: Objection to form. 16 Asked and answered. 17 You can answer the question one more 18 time, Dr. Wu. 19 THE WITNESS: Okay. 20 So again, it's just her feeling, 21 right, about the fairness, the equal standard. 22 BY MR. MUNSHI: 23 Q. Do you consider that a false accusation? 24 MS. SATINSKY: Objection to form.</p>	<p style="text-align: right;">Page 84</p> <p>1 members with respect? 2 A. Oh, yes. 3 Q. Do you feel like you're a good manager? 4 A. I would let my staff or faculty to 5 comment about my performance. I feel confident 6 about myself. 7 Q. What do you consider your greatest 8 strengths as a manager? 9 A. Just a manager. You know that before I 10 joined, the department was in disarray. Just 11 like at department meeting, people fight each 12 other, quarrel with each other, yell in the 13 corridor. 14 Once I join department, and I just 15 give an example, we have like monthly meeting, 16 we all become very professional. And department 17 grow significantly, both in terms of number of 18 students and the research grant. 19 Q. Do you consider yourself to have any 20 weaknesses as a manager? 21 A. Weakness, I think I'm not tough enough. 22 I'm very sympathetic to Ruth. Even after her 23 dismissal, I was thinking about her, about her 24 son. Because she mention about to me many times</p>

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<p style="text-align: right;">Page 85</p> <p>1 about her son's situation.</p> <p>2 Q. Did you have graduate students reporting</p> <p>3 to you as well?</p> <p>4 A. Oh, yeah, many.</p> <p>5 Q. Did you ever get the sense that any of</p> <p>6 your graduate students or staff members were</p> <p>7 intimidated by you?</p> <p>8 A. It could be because I'm tough in the</p> <p>9 sense that I want them to be productive in</p> <p>10 research for graduate students. So I work hard.</p> <p>11 I lead by example. So I always come early and</p> <p>12 leave very late.</p> <p>13 Q. Have you ever raised your voice with any</p> <p>14 of your direct reports?</p> <p>15 A. I raise my voice to my students, but not</p> <p>16 to staff or faculty.</p> <p>17 Q. How often do you raise your voice with</p> <p>18 your students?</p> <p>19 A. Quite often, because sometimes technical</p> <p>20 discussion becomes heated discussion and we</p> <p>21 raise -- I raised voice. But I never do that to</p> <p>22 my staff and my faculty.</p> <p>23 Q. Do you ever yell in Chinese in the</p> <p>24 workplace?</p>	<p style="text-align: right;">Page 87</p> <p>1 people it's -- so I don't think it's anything</p> <p>2 like a disruption to the workplace.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. To your knowledge, no one has ever</p> <p>5 complained that you have done this?</p> <p>6 A. No, no. Not from my staff. Not from my</p> <p>7 students. Not from my faculty.</p> <p>8 MR. MUNSHI: Let's have this marked.</p> <p>9 (P-10 was marked for</p> <p>10 identification.)</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. Dr. Wu, you have P-10 in front of you.</p> <p>13 Please review it.</p> <p>14 A. Uh-huh.</p> <p>15 (Pause.)</p> <p>16 Okay.</p> <p>17 Q. So P-10 is an e-mail from Ruth Briggs to</p> <p>18 Greg Wacker dated October 29th, 2010.</p> <p>19 A. Uh-huh.</p> <p>20 Q. And she writes here, "Greg, I cannot</p> <p>21 come in here day in and day out not knowing if</p> <p>22 I'm going to be applauded or punched. It is</p> <p>23 stressful to me and everyone around me. If I</p> <p>24 wanted to change jobs at Temple, it would be</p>
<p style="text-align: right;">Page 86</p> <p>1 A. Yes, sometimes with my students, Chinese</p> <p>2 students.</p> <p>3 Q. Have you ever been counseled or</p> <p>4 disciplined or reprimanded for raising your</p> <p>5 voice in the workplace?</p> <p>6 A. No, never. I never receive any</p> <p>7 complaint from a colleague.</p> <p>8 Q. But regardless of whether you ever</p> <p>9 received a complaint, do you think it is</p> <p>10 appropriate to raise your voice in the workplace</p> <p>11 like that?</p> <p>12 MS. SATINSKY: Objection to form.</p> <p>13 THE WITNESS: Again, this is a</p> <p>14 technical discussion, like a closed door, so.</p> <p>15 BY MR. MUNSHI:</p> <p>16 Q. Sorry, can you explain to me any sort of</p> <p>17 situation or scenario where it would be</p> <p>18 appropriate for you to be raising your voice to</p> <p>19 a graduate student who reports to you?</p> <p>20 MS. SATINSKY: Objection to form.</p> <p>21 Asked and answered. You can answer the</p> <p>22 question.</p> <p>23 THE WITNESS: Again, to raise the</p> <p>24 voice, again, relative, right. So for some</p>	<p style="text-align: right;">Page 88</p> <p>1 impossible because of him."</p> <p>2 The next paragraph says, "Frankly,</p> <p>3 it borders on harassment. Right now he is in</p> <p>4 his office yelling in Chinese at one of his</p> <p>5 students. The he starts complaining to Justin</p> <p>6 in Chinese about the dean's office. The</p> <p>7 environment is hostile. Even faculty members</p> <p>8 have told me that they are uncomfortable about</p> <p>9 the way he treats me. Ruth."</p> <p>10 Did you ever learn that Ruth Briggs</p> <p>11 sent this e-mail to Greg Wacker?</p> <p>12 A. No, I don't know. I never learned that.</p> <p>13 Q. Did you ever learn that she said to Greg</p> <p>14 Wacker in 2010 that the environment was hostile?</p> <p>15 A. I do not know.</p> <p>16 Q. Did you ever talk with Greg about</p> <p>17 yelling at students --</p> <p>18 A. No.</p> <p>19 Q. -- in the workplace?</p> <p>20 A. No. I never talk to Greg about that.</p> <p>21 Q. And how about anybody at HR, did that</p> <p>22 ever come up?</p> <p>23 A. No. Because I never receive any</p> <p>24 complaint.</p>

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<p style="text-align: right;">Page 89</p> <p>1 Q. Do you know if Greg Wacker ever talked 2 with human resources about Ruth Briggs' 3 statements in here about you yelling or that the 4 environment is hostile? 5 A. No, Greg didn't tell me. 6 MR. MUNSHI: Let's have this marked 7 as <u>P-11</u>. 8 (<u>P-11</u> was marked for 9 identification.) 10 BY MR. MUNSHI: 11 Q. Now, Dr. Wu, in front of you is <u>P-11</u> and 12 this is an e-mail chain. The bottom e-mail is 13 the one we looked at just now, and then there is 14 a top e-mail from Greg Wacker to Deidre Walton. 15 A. Uh-huh. 16 Okay. 17 Q. Do you see here that Greg Wacker 18 forwarded Ruth Briggs' e-mail to Deidre Walton? 19 A. Uh-huh. 20 Q. Sorry. Please just verbalize. 21 A. Yes. 22 Q. And Deidre Walton is the person we spoke 23 about earlier who you know is a member of human 24 resources of Temple; correct?</p>	<p style="text-align: right;">Page 91</p> <p>1 BY MR. MUNSHI: 2 Q. So this e-mail that is in front of you, 3 this e-mail chain is October 29th, 2010, and the 4 e-mail we just looked at before, the one before 5 that, the one that Ruth Briggs sent to you -- 6 A. Uh-huh. 7 Q. -- is November -- 8 MS. SATINSKY: I need you to refer 9 to the exhibit number because I think we are 10 getting confused. 11 BY MR. MUNSHI: 12 Q. So the documents we just looked at, 13 <u>P-11</u>, are e-mails dated October 29th, 2010. 14 A. Uh-huh. 15 Q. And the e-mail we looked at before, <u>P-9</u>, 16 is dated November 9th, 2010. 17 Do you see those? 18 A. Yes. 19 Q. Do you recall when the first time was 20 that you went to human resources to talk about 21 Ruth Briggs' performance? 22 A. I don't recall the date. 23 Q. Do you recall that she started working 24 for you some time in 2009?</p>
<p style="text-align: right;">Page 90</p> <p>1 A. Correct. 2 Q. Did Deidre Walton ever follow up with 3 you or talk to you about how you speak to your 4 students in the workplace? 5 A. No. I don't recall. 6 Q. Did she ever talk to you about Ruth 7 Briggs' statement in her e-mail to Greg Wacker 8 that the environment is hostile? 9 A. No, she didn't. 10 Q. Did Deidre Walton ever follow up with 11 you and talk to you about Ruth Briggs' statement 12 that she e-mailed to Greg Wacker about 13 harassment? 14 A. No. 15 Q. As far as you know, sitting here right 16 now, based on looking at Ruth Briggs' e-mail of 17 October 29th, 2010, and then Greg Wacker's 18 e-mail to Deidre Walton the same day -- 19 A. Uh-huh. 20 Q. -- human resources and Greg Wacker had 21 Ruth Briggs' complaint and no one asked you 22 about it? 23 MS. SATINSKY: Objection to form. 24 THE WITNESS: I don't recall.</p>	<p style="text-align: right;">Page 92</p> <p>1 MS. SATINSKY: Objection. Asked and 2 answered. 3 You can answer one more time. 4 THE WITNESS: Yeah, I think maybe 5 she work under me later 2009 or early 2010. 6 BY MR. MUNSHI: 7 Q. Okay. 8 A. Can I make a comment of her letter? 9 MS. SATINSKY: There is no question. 10 THE WITNESS: No question, right? 11 Okay. 12 BY MR. MUNSHI: 13 Q. It is not like a normal conversation. I 14 am sorry. 15 (<u>P-12</u> was marked for 16 identification.) 17 BY MR. MUNSHI: 18 Q. Now, <u>P-12</u> in front of you is a 19 three-page document. 20 A. Uh-huh. 21 Q. You can go ahead and review that. 22 A. (Pause.) 23 Okay. 24 Q. Dr. Wu, do you see that the e-mail that</p>

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<p style="text-align: right;">Page 93</p> <p>1 you sent to Ralph Jenkins, subject line, "A 2 Revised Letter," is dated November 17th, 2010? 3 A. Yes. 4 Q. And do you see that that is 5 approximately eight days after <u>P-9</u>, the e-mail 6 that we looked at before, from Ruth Briggs to 7 you -- 8 A. Uh-huh. 9 Q. -- where she mentions fairness and 10 treatment and equal applying standards? 11 A. Uh-huh. 12 MS. SATINSKY: Objection to form. 13 THE WITNESS: Yeah, I saw the time. 14 BY MR. MUNSHI: 15 Q. Did you draft this letter that is 16 attached to this e-mail? 17 A. We wrote together with my two associate 18 chair. 19 Q. And are those Justin Shi and Gene 20 Kwanty? 21 A. Yes. 22 Q. Did you submit this letter to human 23 resources? 24 A. Yes.</p>	<p style="text-align: right;">Page 95</p> <p>1 conversations with human resources as to -- 2 A. I had -- 3 Q. Wait. Just for the transcript. 4 Did you have any conversations with 5 anybody in human resources as a result of your 6 letter? 7 A. I think so, but I don't remember exactly 8 the timing. 9 Q. And when you said "no action," what did 10 you mean by that? 11 A. No action means that there is no 12 replacement. 13 Q. Did you meet with anybody in human 14 resources as a result of the letter you sent 15 about Ruth Briggs? 16 MS. SATINSKY: Objection to form. 17 Asked and answered. 18 THE WITNESS: I don't recall. 19 BY MR. MUNSHI: 20 Q. Do you recall saying to anybody in human 21 resources that Ruth Briggs had recently sent you 22 an e-mail talking about fairness and treatment 23 and equal applying standards? 24 MS. SATINSKY: Objection to form.</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. At this point in November of 2010, did 2 you want to terminate Ruth Briggs? 3 A. No. We just want to report the fact and 4 document. Just snapshot of her work just one 5 week. So this happened every week like for five 6 years. 7 Q. What were you hoping would be the result 8 of this letter to human resources? 9 A. We just want to report the fact. 10 Q. At the end of the letter, you write, "I 11 am asking for your assistance in finding a 12 replacement for her position." 13 What did you mean by that? 14 A. Yeah, so that means we seek help from HR 15 for a solution. 16 Q. But what did you mean by replacement? 17 A. Replacement means find another, another 18 job for her. 19 Q. Did human resources ever respond to your 20 letter that you submitted? 21 A. I don't recall if they send me any 22 written comments. I don't know the result. 23 There is no action. 24 Q. How about orally, did you have any</p>	<p style="text-align: right;">Page 96</p> <p>1 Asked and answered. 2 THE WITNESS: I don't recall. 3 MS. SATINSKY: You can answer. 4 THE WITNESS: I just send a letter 5 to HR. I mean, again, collectively with two 6 associate chair and the dean's office. 7 BY MR. MUNSHI: 8 Q. In your conversation with human 9 resources, as a result of the letter or any 10 communications you had with human resources, did 11 it ever come up that Ruth Briggs had recently 12 stated to Greg Wacker that the environment was 13 hostile? 14 A. I do not -- no. She sent an e-mail to 15 Greg. 16 Q. My question was a little bit different. 17 MS. SATINSKY: He said he didn't 18 know she sent the e-mail to Greg. 19 THE WITNESS: I didn't know any of 20 these things. First time I see today. 21 BY MR. MUNSHI: 22 Q. My question was a little bit different. 23 Just so I am clear. Did it ever come up -- 24 forget about the e-mail -- did it ever come up</p>

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<p style="text-align: right;">Page 97</p> <p>1 that Ruth Briggs said that the environment was 2 hostile? 3 A. I don't know. Again, I was surprised 4 she say that the environment's hostile. 5 Q. Why are you surprised? 6 A. Because we are quite friendly in general 7 and she's quite happy organizing events for us. 8 She's good at organizing events. But if we 9 assign her specific job, then she cannot 10 complete on time. 11 Q. Did you ever see her get upset during 12 meetings with you where she started crying? 13 A. Not much. But whenever I point out her 14 weakness and she kind of freeze out, try to 15 defend herself in a wrong way. It could be 16 small things make big things. Like escalate. 17 MR. MUNSHI: Let's take a look at 18 <u>P-13</u>. 19 (<u>P-13</u> was marked for 20 identification.) 21 BY MR. MUNSHI: 22 Q. <u>P-13</u> is an e-mail from Sharon Boyle to 23 you and several other people on December 9th, 24 2010. I will give you a moment to review that.</p>	<p style="text-align: right;">Page 99</p> <p>1 Q. What would she do that would be a 2 disruption to the department? 3 A. Oh, she just spend all the time talking, 4 not doing the work. 5 Q. Was it a disruption in the workplace 6 that she would be talking with Greg Wacker? 7 A. No. Greg is now working the office. 8 Ruth just spend time talking to faculty, some 9 visitors, very loud, just in front of my office. 10 Q. Her office was not in front of your 11 office -- 12 A. It's in front of my office. 13 Q. Was it moved at some point? 14 A. Yes. 15 Q. When? 16 A. I think maybe 2012. Because we sought 17 all kinds of solution. Eventually we think 18 about maybe this is a good way to assign her to 19 upstairs so that she can be more focused. 20 Q. Was it a disruption to the workplace 21 that she was having conversations with people 22 not in the office? 23 A. No. She just grab people whenever 24 someone passed by and have long conversation.</p>
<p style="text-align: right;">Page 98</p> <p>1 A. (Pause.) 2 Okay. 3 Q. Do you see here in the third line that 4 Sharon Boyle writes to you, she writes, "Based 5 on the discussions and information received in 6 both meetings, there is no basis for 7 disciplining Ruth at this time." 8 Do you see that? 9 A. Yeah, I see. 10 Q. And earlier she talks about meeting with 11 Ruth Briggs; right? 12 A. Uh-huh. 13 Q. Do you see that in that letter? 14 A. Yes. 15 Q. Were you satisfied with human resources' 16 handling of your letter? 17 A. In what way by satisfied? 18 Q. Did you agree that there was no basis 19 for disciplining Ruth at this time? 20 A. It depends on what you mean, 21 "discipline." 22 Because to us, Ruth is a big 23 disruption to the whole department, and we just 24 seek help.</p>	<p style="text-align: right;">Page 100</p> <p>1 Then she was saying that the people like to talk 2 to me. It is not like I want to talk to them. 3 Q. I am sorry, I don't know what that 4 means? 5 A. It means she doesn't initiate the 6 conversation. People came to her office to talk 7 to her. In reality it is not. She just grab 8 someone who want to talk and start conversation, 9 all kind of conversations. 10 Q. When she writes to you about her 11 treatment in the workplace by you, is that a 12 disruption as well? 13 MS. SATINSKY: Objection to form. 14 THE WITNESS: No, it's not a 15 disruption. That's why I was kind of surprised 16 he raised these things. 17 BY MR. MUNSHI: 18 Q. Did you talk with Greg Wacker about 19 human resource's conclusion about no basis for 20 disciplining Ruth at this time? 21 MS. SATINSKY: Referring to <u>P-13</u>. 22 THE WITNESS: I don't recall the 23 exact content, but I remember we all know that 24 that's a conclusion at that stage.</p>

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<p style="text-align: right;">Page 101</p> <p>1 BY MR. MUNSHI: 2 Q. Do you recall any conversation with 3 Deidre Walton, who is on this e-mail, <u>P-13</u>, 4 about HR's statement? 5 A. Yeah, as I say, I have many 6 conversations with Deidre, so this could be one 7 of them. 8 Q. Did you have conversations with Deidre 9 Walton about other employees besides Ruth 10 Briggs? 11 A. No. 12 Q. So in all your conversations with Deidre 13 Walton about Ruth Briggs -- 14 A. Yes. 15 Q. -- did you ever disclose to her anything 16 you knew about Ruth Briggs' feelings about the 17 treatment in the office? 18 MS. SATINSKY: Objection to form. 19 THE WITNESS: No. I just say that 20 we are very frustrated and so we need to find a 21 good solution to help Ruth. I was informed that 22 they know the history of Ruth. It's not the 23 problem that she start working with us. So she 24 has a long history of problems.</p>	<p style="text-align: right;">Page 103</p> <p>1 A. I don't remember. Everyone you talk to, 2 everyone knows Ruth, about her problem. 3 Q. Prior to her working underneath you, are 4 you aware if she ever received any sort of 5 written warnings or discipline? 6 A. I don't know. 7 Q. Did you ever see her personnel file and 8 see if there was anything in there? 9 A. No, I never look at her personnel file. 10 Q. Are you aware if she was ever put on any 11 sort of performance improvement plan prior to 12 working underneath you? 13 A. I do not know. 14 Q. Are you aware if she was ever given any 15 sort of workplace suspension before she started 16 working underneath you? 17 A. No. 18 Q. And you are aware that she worked at 19 Temple University for several years before she 20 started working underneath you; correct? 21 MS. SATINSKY: Objection to form. 22 THE WITNESS: Yes, that I know. 23 BY MR. MUNSHI: 24 Q. And when you started talking about</p>
<p style="text-align: right;">Page 102</p> <p>1 BY MR. MUNSHI: 2 Q. You are talking about before you even 3 got to Temple? 4 A. Yeah. Well before. 5 Q. And how do you know about that? 6 A. Because they informed me. 7 Q. Who is "they"? 8 A. The dean's office and HR. 9 Q. Who in the dean's office? 10 A. I don't remember exactly. 11 Q. Who in HR? 12 A. I don't remember exactly. 13 Q. What did they tell you? 14 A. They just say that we understand. We 15 tried to help, but that's not the problem right 16 now. But she has long history of this problem. 17 Q. What did they tell you is the history of 18 the problem? 19 A. They did not go into detail. 20 Q. And you don't recall who said this to 21 you? 22 A. Yeah, I don't recall. 23 Q. When did this person or people say this 24 to you?</p>	<p style="text-align: right;">Page 104</p> <p>1 before, Ralph Jenkins, who is he? Who is Ralph 2 Jenkins? 3 A. Oh, he's a vice dean. 4 Q. Did you report to him? 5 A. Yeah. Technically I report to dean, but 6 he was like executive vice dean. So I have a 7 weekly meeting with him. 8 Q. And Ralph Jenkins is the person who you 9 sent the letter to in <u>P-12</u>; right? 10 A. Yes. 11 Q. You wanted to keep, is it Dr. Jenkins? 12 A. Yes, Dr. Jenkins. 13 Q. You wanted to keep Dr. Jenkins in the 14 loop -- 15 A. In the loop. 16 Q. -- in the loop about Ruth Briggs; right? 17 A. Yes. I -- 18 Q. You -- 19 MS. SATINSKY: Go ahead, finish your 20 answer. 21 THE WITNESS: Because I always keep, 22 whatever the action, I keep the dean's office in 23 the loop. 24 BY MR. MUNSHI:</p>

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<p style="text-align: right;">Page 105</p> <p>1 Q. You meant specifically about Ruth 2 Briggs, you wanted to keep Dr. Jenkins in the 3 loop about any sort of issues you had with Ruth 4 Briggs; right? 5 A. Yes. 6 Q. You wanted him to know that there were 7 any sort of concerns you had with her 8 performance; right? 9 A. Yes. 10 Q. And you had numerous conversations with 11 him about Ruth Briggs in the workplace? 12 A. Oh, yeah. 13 Q. Did you ever have a conversation with 14 him telling him that she sent you an e-mail 15 about being treated fairly in the workplace? 16 A. No. 17 MS. SATINSKY: Objection to form. 18 You can answer. 19 THE WITNESS: I don't recall. 20 BY MR. MUNSHI: 21 Q. So why would you bring him in the loop 22 and keep him in the loop about Ruth Briggs' 23 performance issues allegedly but not tell him 24 about how she felt?</p>	<p style="text-align: right;">Page 107</p> <p>1 BY MR. MUNSHI: 2 Q. And just with regard to Dr. Jenkins, you 3 did not forward Ruth Briggs' e-mail to him that 4 we looked at that is P-9; right? 5 A. No, I didn't. 6 Q. And you didn't forward that same e-mail 7 P-9 to Greg Wacker; right? 8 A. No. 9 Q. Did Ruth Briggs ever tell you that she 10 felt bullied by you? 11 A. No. 12 Q. Did you ever learn from anybody at 13 Temple that Ruth Briggs stated that she felt 14 bullied by you? 15 MS. SATINSKY: Prior to the end of 16 her employment at Temple? 17 MR. MUNSHI: Correct. 18 THE WITNESS: No. 19 Because I always under the 20 assumption I tried to help her. So not to 21 dismiss her. 22 BY MR. MUNSHI: 23 Q. What do you mean by "dismiss her"? 24 A. Dismiss means fire her. The whole</p>
<p style="text-align: right;">Page 106</p> <p>1 MS. SATINSKY: Objection to form. 2 THE WITNESS: Well, because she 3 didn't perform well. 4 BY MR. MUNSHI: 5 Q. So you didn't feel the need to -- 6 MS. SATINSKY: He wasn't finished. 7 You can keep going with your answer. 8 THE WITNESS: Yeah, I don't feel 9 that she was mistreated. I just recalled him 10 the fact about Ruth's performance and 11 disruptions. 12 BY MR. MUNSHI: 13 Q. So because you felt she wasn't being 14 mistreated, that is why you didn't feel the need 15 to bring Dr. Jenkins in the loop about her 16 feelings; right? 17 MS. SATINSKY: Objection to form. 18 Mischaracterizes his testimony. You can answer 19 the question. 20 THE WITNESS: Again, I contact HR 21 many times and also dean's office to seek help 22 to see any way we can help Ruth, either 23 consultation or other means. That's why we kept 24 her for so many years, five years or four years.</p>	<p style="text-align: right;">Page 108</p> <p>1 department try very hard, tried to keep her, to 2 help her to improve her performance. 3 Q. Does Temple have a performance 4 improvement plan system? 5 A. I believe so, but I'm not the expert in 6 that. 7 Q. Was Ruth Briggs ever put on a 8 performance improvement plan? 9 A. I don't recall, but in my annual 10 evaluation, I would give some discussions about 11 how to improve certain categories. 12 Q. But are you aware if Miss Briggs was 13 ever put on a formal performance improvement 14 plan? 15 MS. SATINSKY: Objection to form. 16 THE WITNESS: I don't recall. 17 BY MR. MUNSHI: 18 Q. Did you have the discretion to put her 19 on one of those plans? 20 MS. SATINSKY: Objection to form. 21 What kind of plan? 22 BY MR. MUNSHI: 23 Q. Did you have the discretion to put her 24 on a performance improvement plan?</p>

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<p style="text-align: right;">Page 109</p> <p>1 A. I can give a suggestion, but ultimately 2 it's her decision. 3 Q. I am sorry, whose decision? 4 A. Ruth's decision. To take a class or 5 take some program, yeah. 6 Q. Did you ever have a discussion with 7 anybody about putting Ruth Briggs on a 8 performance improvement plan? 9 A. I don't recall. 10 MS. SATINSKY: Objection to form. 11 Wait to let me object. 12 You can answer. 13 THE WITNESS: Yeah, I'm pretty sure 14 that I had numerous conversations with HR and 15 dean's office seeking help and suggest Ruth to 16 do whatever needed to improve her performance, 17 including training. 18 BY MR. MUNSHI: 19 Q. Did you ever have a conversation with 20 Ruth Briggs specifically about taking classes 21 for training? 22 A. I don't recall. Whatever written in my 23 annual evaluation, I would convey the 24 information to her.</p>	<p style="text-align: right;">Page 111</p> <p>1 Q. How did you learn that she had submitted 2 applications internally? 3 A. I forgot. From different sources. 4 Q. Did you learn that from Ruth? 5 A. Probably not. She probably would not 6 tell me directly. 7 Q. Why do you think that? 8 A. Oh, I don't know. She just didn't tell 9 me directly. It's probably awkward, right, talk 10 to your boss looking for a new job. 11 Q. From wherever you heard it from, 12 whatever source, you did have an understanding 13 that she was looking for a new job away from 14 you; right? 15 MS. SATINSKY: Objection to form. 16 THE WITNESS: Yeah, the latest 17 stage. 18 BY MR. MUNSHI: 19 Q. Just to be clear, my question was, did 20 you have an understanding that the job she was 21 looking for were other jobs reporting to you or 22 outside of your reporting? 23 A. Yeah, I would say yes. But I don't know 24 the detail which department she applied.</p>
<p style="text-align: right;">Page 110</p> <p>1 Q. Did anybody from HR or the EEO office or 2 anybody at Temple ever ask you if you were 3 treating Ruth the same way as other people prior 4 to her termination? 5 MS. SATINSKY: Objection to form. 6 You can answer. 7 THE WITNESS: Again, no one 8 questioned the way I treat Ruth. I treat 9 everyone just the same. 10 BY MR. MUNSHI: 11 Q. And did anybody at Temple ever inform 12 you that they were looking into concerns that 13 Ruth raised about you? 14 MS. SATINSKY: Objection to form. 15 Prior to the end of her employment? 16 BY MR. MUNSHI: 17 Q. Prior to the end of her termination? 18 A. No. Actually, I never know that Ruth is 19 complaining about me. 20 Q. At any point did you learn that Ruth 21 Briggs was submitting job applications 22 internally at Temple? 23 A. This I know. I think she tried many 24 places, but was not successful.</p>	<p style="text-align: right;">Page 112</p> <p>1 Q. Do you have any understanding as to why 2 she wanted to transfer away from you? 3 MS. SATINSKY: Objection to form. 4 THE WITNESS: Oh, it's clear because 5 she understand that she's not suitable for her 6 job as the executive assistant. 7 BY MR. MUNSHI: 8 Q. Do you know what her job was before she 9 started reporting to you? 10 A. Yes. 11 Q. What was that? 12 A. She's executive assistant to dean. 13 Q. So she had the same job title before you 14 were even -- 15 A. Oh, yes, yes. 16 Q. And when she was the executive assistant 17 to the dean, are you aware of any conversations 18 about potentially firing her for bad 19 performance? 20 A. I do not know. Actually, when I joined 21 Temple I was very happy that Ruth can work with 22 me because she's very friendly when I interview. 23 She's the one like meet and greet me. So I feel 24 very happy that she can work with me.</p>

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<p style="text-align: right;">Page 113</p> <p>1 Q. Did that change at some point that you 2 no longer felt happy working with her? 3 A. Oh, yeah, once you start working with 4 her, you know her performance. 5 Q. At what point did you reach that 6 conclusion? 7 A. Oh, very early. Because she some time 8 make a decision by her own without informing me. 9 Like her office, she make a huge office. 10 Q. What do you mean by that? 11 A. You know, her office like a cubicle. So 12 she just decide to up the size of her office 13 just the first few days of her work. 14 Q. When did you first think about firing 15 her? 16 MS. SATINSKY: Objection to form. 17 THE WITNESS: I don't recall. But 18 this is after at least a year with all the 19 struggles. 20 BY MR. MUNSHI: 21 Q. When was the first time, if ever, you 22 have a discussion with somebody about firing 23 her? 24 MS. SATINSKY: Objection to form.</p>	<p style="text-align: right;">Page 115</p> <p>1 A. No, definitely not. No, I mean her 2 level is not executive secretary level. That's 3 why the whole department struggled. 4 Q. So in all these efforts that you are 5 talking about here, did you ever talk with 6 anybody at Temple about finding her another job? 7 A. Yes, I think so. 8 Q. Who did you have those conversations 9 with? 10 A. I think it was the dean's office and HR. 11 Q. Any understanding as to why she wasn't 12 simply moved? 13 A. Because her performance is so terrible, 14 no one want her. 15 Q. Her performance from when? 16 A. I do not -- 17 Q. From all the years before -- 18 A. Yeah. 19 Q. -- or under you? 20 A. I do not know which one. 21 MR. MUNSHI: P-14, please. 22 (P-14 was marked for 23 identification.) 24 BY MR. MUNSHI:</p>
<p style="text-align: right;">Page 114</p> <p>1 THE WITNESS: Again, I don't recall. 2 I usually only seek help from the deans and HR 3 and ask their suggestions. 4 BY MR. MUNSHI: 5 Q. And I am talking specifically about the 6 concept of firing her. Not disciplining her, 7 not reprimanding her. Actually firing her. 8 What is the first conversation you 9 recall where that concept was discussed? 10 MS. SATINSKY: Objection to form. 11 THE WITNESS: I have many 12 conversations with, especially associate chair. 13 We always want to protect Ruth not to fire her. 14 The ideal situation we conclude is that find a 15 suitable job for her inside campus. But 16 executive secretary is not her job. 17 BY MR. MUNSHI: 18 Q. What do you mean by "executive 19 secretary"? 20 A. Executive secretary you have lots of 21 responsibilities. She cannot perform the work 22 we assigned her. 23 Q. Did you consider her to be an executive 24 secretary?</p>	<p style="text-align: right;">Page 116</p> <p>1 Q. Dr. Wu, in front of you is a document 2 that has been marked as P-14. I will give you a 3 moment to review that. 4 A. (Pause.) 5 Okay. 6 Q. This disciplinary report is dated 7 March 26th, 2013. Do you see that? 8 A. Uh-huh. 9 Q. Just verbalize, please. 10 A. Yes. 11 Q. Do you recall giving or Miss Briggs 12 receiving some discipline in connection with an 13 issue with a man named Clint Whaley? 14 A. Oh, yes. That's one of the candidate 15 and she forgot to book the ticket. 16 Q. Whose decision was it to give her this 17 discipline? 18 A. Again, all this one is a joint 19 discussion. I would never issue this letter 20 before talking to the dean's office. 21 Q. Who did you talk to in the dean's office 22 before giving her this discipline? 23 A. Usually Greg. 24 Q. And again, going back to what we said</p>

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<p style="text-align: right;">Page 117</p> <p>1 earlier, I don't want to know usually or 2 generally or typically. 3 A. Yeah, I'm pretty sure it was Greg. 4 Q. Do you have a specific recollection of 5 talking with Greg about issuing Ruth Briggs this 6 discipline? 7 A. Yes, because this is everyone in the 8 department knows this incident. 9 Q. What do you recall discussing with Greg 10 prior to issuing this discipline? 11 A. I don't recall. I just report the fact. 12 Then we have a long discussion. Then we come up 13 the level of disciplinary. 14 Q. Do you recall having conversations with 15 anybody else besides Greg about issuing this 16 discipline to Ruth Briggs? 17 A. Oh, yes, I always discuss with two 18 associate chair. 19 Q. And again, I just want to caution you 20 that I am not talking about usually or always. 21 A. No, definitely I talked to both 22 associate chairs. 23 Q. What do you recall discussing with 24 Justin Shi about issuing this discipline?</p>	<p style="text-align: right;">Page 119</p> <p>1 Q. Is it your understanding that it was 2 within your discretion to assign it a Level C or 3 a Level D? 4 A. Oh, yeah, yeah, because ultimately it's 5 my responsibility. 6 Q. Was it also within your discretion to 7 not give her any discipline at all? 8 A. Yeah. 9 MR. MUNSHI: Let's have this as 10 <u>P-15</u>, please. 11 (<u>P-15</u> was marked for 12 identification.) 13 BY MR. MUNSHI: 14 Q. You can have a moment to review that. 15 A. (Pause.) 16 Yes. 17 Q. These e-mails, or the top e-mail from 18 you is from a Gmail account. Do you see that? 19 A. Yeah. 20 Q. Would you often use a Gmail account? 21 A. Yes, I always use it. 22 Q. You always use a Gmail account to 23 conduct Temple business? 24 A. Yes.</p>
<p style="text-align: right;">Page 118</p> <p>1 A. I don't recall the exact conversation. 2 Because the whole department is waiting for the 3 candidate to come to conduct interview. We set 4 up itinerary, then the same day find out the 5 ticket never issue. 6 Q. Whose decision was it to give her a 7 three-day suspension instead of a written 8 warning or any other form of discipline? 9 A. Again, it's a collective decision. 10 Q. And collective in this instance of who? 11 Not usually in this instance. Collectively 12 means who? 13 A. It means me and Greg, maybe Drew. 14 Q. And Drew, you said? 15 A. Yeah, and Drew. Drew's always in the 16 loop. 17 Q. Do you recall any conversations with 18 Drew DiMeo about issuing Ruth Briggs this 19 specific discipline? 20 A. I don't recall. 21 Q. Whose decision was it to classify this 22 as a Level C discipline? 23 A. I'm not expert in terms of deciding the 24 level. I always consult with the dean's office.</p>	<p style="text-align: right;">Page 120</p> <p>1 Q. Why is that? 2 A. Oh, because it's convenient. I have so 3 many different e-mails, so it's all converted to 4 my Gmail. 5 Q. Did anyone from the university ever tell 6 you not to use Gmail? 7 A. No. 8 Q. Did you ever have to discuss 9 confidential matters by e-mail using your Gmail 10 address? 11 A. I use most of the time the Gmail 12 account. 13 Q. Did anyone ever tell you to stop using 14 Gmail? 15 A. No. 16 Q. Did anyone ever raise with you that that 17 might be a concern? 18 A. No, no one. 19 Q. With regard to this issue discussed in 20 <u>P-15</u>, do you recall if Miss Briggs ever admitted 21 to making a mistake with the booking of the 22 travel? 23 A. Oh, this one I think she admitted. 24 Q. This one she?</p>

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<p style="text-align: right;">Page 121</p> <p>1 A. She admitted.</p> <p>2 Q. What do you recall about that?</p> <p>3 A. I don't remember exact, but she didn't</p> <p>4 dispute the fact she forgot to do the work.</p> <p>5 Q. Do you recall her having a discussion</p> <p>6 with you about admitting to the fact?</p> <p>7 A. I don't recall that.</p> <p>8 Q. Do you recall how you learned that she</p> <p>9 admitted to it?</p> <p>10 A. I don't recall.</p> <p>11 Q. But one way or another you knew she --</p> <p>12 A. Oh, yeah, yeah. I must have talked to</p> <p>13 her.</p> <p>14 Q. Did you --</p> <p>15 MS. SATINSKY: And I don't want you</p> <p>16 to guess, so just testify about what you</p> <p>17 actually remember.</p> <p>18 THE WITNESS: Yeah, I don't remember</p> <p>19 exact, the sequence and the format.</p> <p>20 BY MR. MUNSHI:</p> <p>21 Q. So putting aside how you learned that</p> <p>22 she had admitted to it, did you believe her,</p> <p>23 that she made a mistake?</p> <p>24 A. Yeah, she made a mistake.</p>	<p style="text-align: right;">Page 123</p> <p>1 THE WITNESS: Yes.</p> <p>2 So what's your question?</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. My question is, the top e-mail is from</p> <p>5 you to Eugene Kwanty where you wrote, "Gene,</p> <p>6 call me before you reply. Ruth." And then your</p> <p>7 name. Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Do you recall having a conversation with</p> <p>10 Gene about --</p> <p>11 A. Oh, I just want to find out what's the</p> <p>12 problem.</p> <p>13 Q. Well, you asked him to talk to you</p> <p>14 before he spoke with Ruth.</p> <p>15 Why did you do that?</p> <p>16 A. Because I want to know the fact before I</p> <p>17 talk to Ruth.</p> <p>18 Q. Ruth's e-mail is not to you. It is to</p> <p>19 Dr. Kwanty.</p> <p>20 A. Uh-huh.</p> <p>21 MS. SATINSKY: Objection to form.</p> <p>22 BY MR. MUNSHI:</p> <p>23 Q. Do you see that?</p> <p>24 A. Yeah.</p>
<p style="text-align: right;">Page 122</p> <p>1 MR. MUNSHI: Let's look at <u>P-16</u>,</p> <p>2 please.</p> <p>3 (<u>P-16</u> was marked for</p> <p>4 identification.)</p> <p>5 MS. SATINSKY: Just for the record,</p> <p>6 <u>P-16</u>, I don't think this is a complete e-mail.</p> <p>7 It is cut off.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. So <u>P-15</u>, which I think is in that stack</p> <p>10 there, the e-mail that you sent to Gene Kwanty,</p> <p>11 is March 25th, 2013, at 8:21 a.m.?</p> <p>12 A. Uh-huh.</p> <p>13 Q. I am actually pointing to <u>P-15</u>.</p> <p>14 A. Yeah.</p> <p>15 Q. I am just orienting you to the time.</p> <p>16 A. Okay.</p> <p>17 Q. 8:21 a.m.</p> <p>18 And then on <u>P-16</u>, do you see at</p> <p>19 10:51, same date, Ruth Briggs writes to you,</p> <p>20 Andrew and Kwanty, "When you have time today,</p> <p>21 may I come talk to you regarding Clint Whaley?"</p> <p>22 Do you see that?</p> <p>23 MS. SATINSKY: Objection to form.</p> <p>24 Mischaracterizes the document. You can answer.</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. So why did you want to talk to</p> <p>2 Dr. Kwanty before he spoke to Ruth?</p> <p>3 A. Yeah, because Dr. Kwanty working with</p> <p>4 me, under me, and he's a search committee chair.</p> <p>5 So I want to hear Gene Kwanty's story.</p> <p>6 Q. You wanted to hear Gene Kwanty's story</p> <p>7 before he spoke with Ruth?</p> <p>8 A. No. I just want to know the fact as</p> <p>9 soon as possible.</p> <p>10 Q. Okay. But you wrote before you reply to</p> <p>11 Ruth. Why was it important for you to talk to</p> <p>12 him before you --</p> <p>13 A. I don't recall the exact content.</p> <p>14 So this implies that it's urgency.</p> <p>15 I want to talk to him first.</p> <p>16 MR. MUNSHI: <u>P-17</u>.</p> <p>17 (<u>P-17</u> was marked for</p> <p>18 identification.)</p> <p>19 BY MR. MUNSHI:</p> <p>20 Q. In front of you is <u>P-17</u>.</p> <p>21 MS. SATINSKY: I will permit</p> <p>22 Mr. Munshi to question Dr. Wu about <u>P-17</u>, but I</p> <p>23 will note for the record this is an incomplete</p> <p>24 e-mail.</p>

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<p style="text-align: right;">Page 125</p> <p>1 THE WITNESS: (Pause.)</p> <p>2 Okay.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. So the top e-mail from Ruth Briggs, did</p> <p>5 you see here she writes, "Dear Dr. Kwanty,</p> <p>6 thanks for meeting with me today." She</p> <p>7 said, "As I said, I dropped the ball and I am</p> <p>8 very sorry about failing to confirm Clint</p> <p>9 Whaley's flight reservation. Please let me know</p> <p>10 if you change you mind and want me to send an</p> <p>11 apology to Dr. Whaley."</p> <p>12 Do you see that?</p> <p>13 A. Uh-huh. Yes.</p> <p>14 Q. Did you think Ruth was sincere in her</p> <p>15 apology that she wrote to Dr. Whaley?</p> <p>16 MS. SATINSKY: Objection to form.</p> <p>17 You can answer.</p> <p>18 THE WITNESS: Yes. Yes, I think so.</p> <p>19 BY MR. MUNSHI:</p> <p>20 Q. And do you recall her asking if she</p> <p>21 could send an apology to Clint Whaley?</p> <p>22 A. I don't recall, but I see this one.</p> <p>23 Q. The decision to give Ruth Briggs a</p> <p>24 three-day suspension was made after she admitted</p>	<p style="text-align: right;">Page 127</p> <p>1 the level.</p> <p>2 BY MR. MUNSHI:</p> <p>3 Q. Have you ever given any -- I'm sorry.</p> <p>4 A. I mean together with the dean's office.</p> <p>5 Q. Have you ever given any other staff</p> <p>6 member a three-day suspension besides Ruth</p> <p>7 Briggs?</p> <p>8 A. No.</p> <p>9 Q. How about since Ruth Briggs'</p> <p>10 termination?</p> <p>11 A. No.</p> <p>12 MS. SATINSKY: Objection to form.</p> <p>13 THE WITNESS: No.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. Have you ever given any other staff</p> <p>16 member a Level C discipline?</p> <p>17 A. I don't think so.</p> <p>18 Q. In all your years of managing employees</p> <p>19 at Temple, has any employee reporting to you</p> <p>20 ever made a mistake?</p> <p>21 A. Oh, they made mistake.</p> <p>22 Q. Has anybody ever made a mistake that</p> <p>23 they admitted to dropping the ball, but you</p> <p>24 still disciplined them?</p>
<p style="text-align: right;">Page 126</p> <p>1 to dropping the ball; right?</p> <p>2 A. Uh-huh, uh-huh.</p> <p>3 MS. SATINSKY: Objection to form.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. And this was a three-day unpaid</p> <p>7 suspension; right?</p> <p>8 A. Yes.</p> <p>9 Q. If you wanted to, it was within your</p> <p>10 discretion to give her a Level B violation</p> <p>11 instead of a Level C violation; is that right?</p> <p>12 A. Uh-huh.</p> <p>13 MS. SATINSKY: Objection. Asked and</p> <p>14 answered. And again, Rahul, you continue to ask</p> <p>15 the same questions. I will permit Dr. Wu, and</p> <p>16 like I said, I have given you a lot of leeway on</p> <p>17 it, but I am going to start telling Dr. Wu to</p> <p>18 stop answering questions he has already</p> <p>19 answered.</p> <p>20 So Dr. Wu, you can answer this</p> <p>21 question.</p> <p>22 THE WITNESS: Yes, again, these</p> <p>23 decisions are collective. We assess the level</p> <p>24 of violation of disciplinary. Then we decide</p>	<p style="text-align: right;">Page 128</p> <p>1 A. No, no one has that kind of repeated</p> <p>2 mistake and severeness as Ruth, like this</p> <p>3 incident.</p> <p>4 Q. Have you ever given anybody a Level B</p> <p>5 discipline besides Ruth?</p> <p>6 A. I don't recall that.</p> <p>7 Q. How about a Level A discipline?</p> <p>8 A. No.</p> <p>9 Q. Is Ruth Briggs the only person who you</p> <p>10 have given discipline, a disciplinary report to</p> <p>11 for making a mistake?</p> <p>12 MS. SATINSKY: Objection to form.</p> <p>13 THE WITNESS: I think so.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. Was there an official department policy</p> <p>16 on how to inform you if the staff member is</p> <p>17 running late to work?</p> <p>18 MS. SATINSKY: Objection to form.</p> <p>19 THE WITNESS: Yes. It's kind of</p> <p>20 informal rule if someone late or we take</p> <p>21 vacation, they will e-mail me. And we have</p> <p>22 another staff to record the fact.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. And when you say "informal rule," what</p>

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<p style="text-align: right;">Page 129</p> <p>1 do you mean by that?</p> <p>2 A. I don't recall that we issued like a</p> <p>3 letter say you need to give me two-day notice or</p> <p>4 something.</p> <p>5 Informal means that if you want to</p> <p>6 take a day off, you need to inform me a day</p> <p>7 early. So that's it.</p> <p>8 Q. And what was the informal rule if</p> <p>9 somebody is just late, not taking a day off,</p> <p>10 just late?</p> <p>11 A. This happened because of traffic, so I</p> <p>12 don't take that seriously. But if it's repeat,</p> <p>13 then I will have a verbal warning, a</p> <p>14 conversation.</p> <p>15 Q. And did you ever have that with anybody?</p> <p>16 A. I think so.</p> <p>17 Q. Sitting here right now, can you tell me</p> <p>18 the name of anyone --</p> <p>19 A. Yes, I think Judy sometimes late. And</p> <p>20 there's another one, Hailey, I had a</p> <p>21 conversation.</p> <p>22 Q. Judy Lennon?</p> <p>23 A. Yes, Judy Lennon.</p> <p>24 Q. Did you ever issue any written</p>	<p style="text-align: right;">Page 131</p> <p>1 A. Oh, she just disappear. Not disappear.</p> <p>2 But out of reach, maybe out of power for a</p> <p>3 couple days and no one knows where she is, she</p> <p>4 was. So when she come back, then we have</p> <p>5 serious conversation with her.</p> <p>6 Q. So there were a couple of days where she</p> <p>7 didn't show up to work?</p> <p>8 A. No.</p> <p>9 Q. And there were a couple of days where</p> <p>10 she didn't inform you about whatever her</p> <p>11 situation was?</p> <p>12 A. Yeah, yeah. But that's during the</p> <p>13 hurricane.</p> <p>14 Q. And during that hurricane for a couple</p> <p>15 of days she didn't e-mail you?</p> <p>16 A. She didn't e-mail me.</p> <p>17 Q. And during that hurricane for a couple</p> <p>18 of days she didn't call you; right?</p> <p>19 A. She didn't call me.</p> <p>20 Q. She didn't call anybody in the office;</p> <p>21 right?</p> <p>22 A. Yeah, probably not. That's why we have</p> <p>23 serious conversation.</p> <p>24 Q. But nothing written down?</p>
<p style="text-align: right;">Page 130</p> <p>1 discipline or written warning to Judy Lennon?</p> <p>2 A. I don't recall. It could be one, but</p> <p>3 maybe not. I issued many times verbal warning.</p> <p>4 I never issued written warning without a verbal</p> <p>5 warning first.</p> <p>6 Q. And Hailey King, did you ever give her a</p> <p>7 written warning about --</p> <p>8 A. No. But I have a very serious verbal</p> <p>9 warning with her. That's during the hurricanes.</p> <p>10 Q. Was the very serious --</p> <p>11 MS. SATINSKY: I don't think he was</p> <p>12 finished.</p> <p>13 THE WITNESS: During the hurricane.</p> <p>14 BY MR. MUNSHI:</p> <p>15 Q. During the hurricane?</p> <p>16 A. Yes. She was absent for a couple days.</p> <p>17 Q. This very serious verbal warning that</p> <p>18 you gave to Hailey King, is there any note about</p> <p>19 it?</p> <p>20 A. No.</p> <p>21 Q. Did you inform anybody in writing?</p> <p>22 A. No. It's not in writing, but many</p> <p>23 people knows. Justin Shi knows.</p> <p>24 Q. And what was the issue with Hailey King?</p>	<p style="text-align: right;">Page 132</p> <p>1 A. Nothing written down. Because to me it</p> <p>2 is just one single incident, during the</p> <p>3 hurricane. I come in from Florida. I went</p> <p>4 through all hurricane season, so I know the</p> <p>5 life.</p> <p>6 Q. But it was one incident that took place</p> <p>7 over multiple days; right?</p> <p>8 A. Yes. Just one of many.</p> <p>9 Q. Prior to January 2014, was there ever an</p> <p>10 issue with Ruth Briggs showing up late without</p> <p>11 properly informing you?</p> <p>12 A. Oh, this is constant. She's always late</p> <p>13 and then she come up with all kinds of excuses.</p> <p>14 Q. Did you have verbal conversations with</p> <p>15 her about being late?</p> <p>16 A. Oh, yes.</p> <p>17 Q. Prior to giving her a written warning,</p> <p>18 did you ever write down anywhere that she had</p> <p>19 problems with being late?</p> <p>20 A. No, I did not write down. Oh, I could</p> <p>21 have. I can check my e-mail. I think I keep</p> <p>22 notes a certain period.</p> <p>23 Q. Notes about what?</p> <p>24 A. About Ruth's problem.</p>

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<p style="text-align: right;">Page 133</p> <p>1 Q. About being late or other things?</p> <p>2 A. Other things. Again, I have all the</p> <p>3 e-mails. So sometimes I just wrote myself an</p> <p>4 e-mail about Ruth.</p> <p>5 Q. You write yourself notes to --</p> <p>6 A. Yeah.</p> <p>7 Q. -- that you didn't send to other people?</p> <p>8 A. Yeah, I didn't send.</p> <p>9 MR. MUNSHI: I don't think we have</p> <p>10 any of those, Rachel.</p> <p>11 MS. SATINSKY: Rahul, we searched</p> <p>12 documents. We talked to you about our document</p> <p>13 searches, and to the extent that they existed</p> <p>14 and were hit on our document searches, they</p> <p>15 would have been produced.</p> <p>16 BY MR. MUNSHI:</p> <p>17 Q. Are you sure they exist?</p> <p>18 A. I really don't know. I could send my</p> <p>19 e-mail, usually I send myself an e-mail and just</p> <p>20 keep a record. But I think the team search all</p> <p>21 my e-mail. A team came to my office to get all</p> <p>22 my e-mail.</p> <p>23 Q. Gmail and Temple?</p> <p>24 A. Yeah, yeah.</p>	<p style="text-align: right;">Page 135</p> <p>1 identification.)</p> <p>2 MS. SATINSKY: Can we go off the</p> <p>3 record.</p> <p>4 (A discussion was held off the</p> <p>5 record.)</p> <p>6 BY MR. MUNSHI:</p> <p>7 Q. Dr. Wu, In front of you is <u>P-18</u>. I will</p> <p>8 give you a moment to review that.</p> <p>9 A. Okay.</p> <p>10 Q. Do you see that this is a disciplinary</p> <p>11 report dated January 20th, 2014?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Sorry.</p> <p>14 A. Yes, I saw it.</p> <p>15 Q. And this was a written warning --</p> <p>16 A. Yeah.</p> <p>17 Q. -- given to Ruth Briggs.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And this was a violation of Work Rule</p> <p>21 B.10. Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Whose decision was it to give Ruth</p> <p>24 Briggs this discipline?</p>
<p style="text-align: right;">Page 134</p> <p>1 Q. If somebody is running late, a staff</p> <p>2 member is running late, would it be appropriate</p> <p>3 notice for that person to call the office and</p> <p>4 ask to speak with you?</p> <p>5 A. No. Usually they send a note to the</p> <p>6 staff who managing the time and cc me.</p> <p>7 Q. That was the informal policy; right?</p> <p>8 A. Yes, informal policy.</p> <p>9 Q. But would it be appropriate to forget</p> <p>10 about writing an e-mail, just calling you up?</p> <p>11 A. Sometimes, yes. Some people call me.</p> <p>12 Q. If you weren't available, would it be</p> <p>13 appropriate for someone to say to Judy Lennon,</p> <p>14 I'll be there soon?</p> <p>15 A. Yeah, they always talk to each other to</p> <p>16 cover each other.</p> <p>17 Q. And if you are not available and Judy</p> <p>18 Lennon is not available, would it be appropriate</p> <p>19 to say whoever picks up the phone, "Tell Dr. Wu</p> <p>20 I'll be there soon"?</p> <p>21 A. Yes.</p> <p>22 MR. MUNSHI: Let's have this</p> <p>23 document marked as <u>P-18</u>, please.</p> <p>24 (<u>P-18</u> was marked for</p>	<p style="text-align: right;">Page 136</p> <p>1 A. Again, all the decision I collectively</p> <p>2 talked to the dean's office. They reach a</p> <p>3 conclusion the level. I talked to the dean's</p> <p>4 office every week almost about Ruth.</p> <p>5 Q. This discipline is signed by Andrew</p> <p>6 DiMeo. Do you see that?</p> <p>7 A. Okay, yes.</p> <p>8 Q. Did you talk with Ruth Briggs about this</p> <p>9 discipline?</p> <p>10 A. Again, I don't recall, because whenever</p> <p>11 we issue this written statement, we talk to</p> <p>12 Ruth, inform Ruth, and she signs.</p> <p>13 Q. Do you recall Ruth Briggs saying that</p> <p>14 she told a student-worker she was running late</p> <p>15 because you weren't available?</p> <p>16 A. I don't remember this incident.</p> <p>17 Q. Is there anything you recall about this</p> <p>18 incident that led to this discipline?</p> <p>19 A. I don't remember. Because so many</p> <p>20 violations, so I don't recall specifically which</p> <p>21 one.</p> <p>22 Q. Well, I know you didn't sign this</p> <p>23 document, but do you recall specifically any</p> <p>24 conversations with Andrew or Greg or anyone</p>

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<p style="text-align: right;">Page 137</p> <p>1 else --</p> <p>2 A. I don't know.</p> <p>3 Q. Sorry.</p> <p>4 -- before this was issued?</p> <p>5 A. I don't recall.</p> <p>6 Q. Do you recall having a conversation with</p> <p>7 a student-worker where she told you that Ruth</p> <p>8 Briggs talked to her about coming in late?</p> <p>9 A. Maybe, but I don't recall the exact</p> <p>10 incidents for this. As I say, she always late,</p> <p>11 so it's no surprise.</p> <p>12 Q. She was always late, but this is the one</p> <p>13 and only discipline you gave her for being late;</p> <p>14 right?</p> <p>15 MS. SATINSKY: Objection to form.</p> <p>16 Mischaracterizes testimony. You can answer the</p> <p>17 question.</p> <p>18 THE WITNESS: Again, I don't recall</p> <p>19 the nature for this disciplinary. Usually for</p> <p>20 like a single time late, we would not discipline</p> <p>21 them. It must be a sequence of things, or</p> <p>22 lying.</p> <p>23 BY MR. MUNSHI:</p> <p>24 Q. Did you think Ruth Briggs was lying?</p>	<p style="text-align: right;">Page 139</p> <p>1 Q. How about Hailey King, as part of her</p> <p>2 job, did she have to clock in and clock out?</p> <p>3 A. Yeah. I think all staff need to clock</p> <p>4 in and clock out.</p> <p>5 Q. At any point did some of Ruth Briggs'</p> <p>6 job duties go to Hailey King?</p> <p>7 A. I don't recall, but we have kind of</p> <p>8 informal policy when staff was absent, the other</p> <p>9 staff need to cover. So they need to cover each</p> <p>10 other possibly.</p> <p>11 Q. Besides a temporary covering for each</p> <p>12 other --</p> <p>13 A. It is temporary covering usually. Not a</p> <p>14 permanent coverage.</p> <p>15 Q. Do you recall at any point permanently</p> <p>16 any job duties going from Ruth Briggs to Hailey</p> <p>17 King?</p> <p>18 A. I don't remember. Could be. Maybe</p> <p>19 something related to academic or something. Or</p> <p>20 maybe Ruth's other work. So this could happen.</p> <p>21 There are lots of jobs that permanent assigned.</p> <p>22 There are also some ad hoc type job which is</p> <p>23 assigned based on the need.</p> <p>24 Q. Who made the decision to terminate Ruth</p>
<p style="text-align: right;">Page 138</p> <p>1 A. Not lying. She just -- this is her</p> <p>2 character, so she try to cover herself with</p> <p>3 other excuses.</p> <p>4 Q. Did you ever have a conversation with</p> <p>5 her about being late or being absent where you</p> <p>6 thought she was lying to you?</p> <p>7 A. No. Just say you need to come on time.</p> <p>8 We all need to work.</p> <p>9 Q. Did you ever accuse Miss Briggs of</p> <p>10 purposefully or intentionally missing a meeting</p> <p>11 with you?</p> <p>12 A. I don't think so.</p> <p>13 Q. Did you ever accuse Miss Briggs in your</p> <p>14 meetings with her one-on-one or with anyone else</p> <p>15 present, did you ever accuse her of not telling</p> <p>16 the truth to you?</p> <p>17 A. No. I think she's an honest person.</p> <p>18 Q. She's an honest person?</p> <p>19 A. Yes, she's an honest person. But</p> <p>20 whenever we point to her weakness, then she try</p> <p>21 to overly defend herself.</p> <p>22 Q. Was Miss Briggs required as part of her</p> <p>23 job to clock in and clock out?</p> <p>24 A. Yes, I think.</p>	<p style="text-align: right;">Page 140</p> <p>1 Briggs' employment?</p> <p>2 MS. SATINSKY: Objection to form.</p> <p>3 THE WITNESS: Again, it's a</p> <p>4 collective, it's usual. And then I report the</p> <p>5 fact in the dean's office and I just discuss. I</p> <p>6 assume the dean's office check with HR. They</p> <p>7 reach a conclusion that that's the termination.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. So just talking about the decision</p> <p>10 itself, when you say "collective," specific to</p> <p>11 the decision on this termination --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- what does "collective" mean?</p> <p>14 MS. SATINSKY: Objection to form.</p> <p>15 THE WITNESS: Collective means that</p> <p>16 we discuss and we think that's the offense that</p> <p>17 result in the termination.</p> <p>18 BY MR. MUNSHI:</p> <p>19 Q. And who is the "we"?</p> <p>20 A. I would say Greg. Greg, me and Drew.</p> <p>21 Q. What is the first time you recall anyone</p> <p>22 discussing with you the concept of terminating</p> <p>23 Ruth Briggs' employment?</p> <p>24 A. I don't recall. Maybe like the second</p>

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<p style="text-align: right;">Page 141</p> <p>1 year. Again, it's not termination. We just say 2 that can we find Ruth a suitable job on campus, 3 like a replacement. 4 Q. So her last day of employment at Temple 5 was in 2014, April 1, 2014? 6 A. Yes. 7 Q. Before April 1, 2014, do you recall any 8 conversations with Greg or Drew or anybody else 9 about terminating her employment? 10 A. I don't recall. But the conversation 11 not phrasing terminations. Just we need to 12 collect all the fact for this violation or we 13 just report. 14 Q. So regardless of what ended up 15 happening -- 16 A. Yeah. 17 Q. -- did you ever have a conversation in 18 2014 about terminating her employment? 19 A. Probably. I don't recall exactly the 20 format of reaching the conclusion. 21 Q. So at some point you know that she is no 22 longer working at Temple; right? 23 A. Oh, yeah, yeah. This takes awhile. You 24 know, all these things is ultimately decided by</p>	<p style="text-align: right;">Page 143</p> <p>1 Q. How did you learn that she was going to 2 no longer be working at Temple? 3 A. Oh, because someone told me that she 4 signed a document. 5 Q. Prior to her signing that document -- 6 A. Oh, I do not know, yeah. 7 Q. So I'm trying to take you back to the 8 period before she left. So April 1, 2014, was 9 her last day. 10 A. Yeah. 11 Q. So prior to April 1, 2014, did you have 12 an understanding one way or another that she was 13 going to not be working at Temple any more? 14 A. Oh, yeah, I know that. 15 Q. So how did you know that? 16 A. Because we have all the conversations 17 and all these, I report these incidents. I 18 think the action was very quick, and I think the 19 dean's office approach her. Then she 20 immediately know that she would be fired. So 21 she was very calm. That's what I'm told. 22 Q. You weren't there for that meeting? 23 A. No, I was not there. 24 Q. Going back to any meetings or</p>
<p style="text-align: right;">Page 142</p> <p>1 HR. 2 Q. Taking you to the April 2014 time 3 period, was it your understanding that she was 4 terminated or she resigned or she was 5 transferred? What was your understanding? 6 A. I understand that she just terminated. 7 But later I heard that it could be maybe, there 8 are several choices, but I do not know the 9 details. But I really care about her, so I 10 suggest that any way we can help her, covering 11 her son, because her son is close to graduation. 12 If we terminate her, the son will lose the 13 support to continue studying at Temple. So I 14 discussed with Gene Kwanty and Justin about 15 that. 16 Q. So I am clear here, how did you learn 17 that she was no longer working at Temple? 18 A. I think someone informed me and that 19 Ruth just admitted error very calmly, signed a 20 document, whatever the termination. 21 Q. So prior to her actually leaving Temple, 22 did you know that she was going to no longer be 23 working at Temple? 24 A. Yeah, I know.</p>	<p style="text-align: right;">Page 144</p> <p>1 conversations that you had, were you part of any 2 meeting or conversation where it was decided we 3 are going to take action against Ruth and 4 terminate her employment? 5 A. I don't recall exactly, but I report the 6 fact of all these offenses, discuss with the 7 dean's office. 8 Q. And the dean's office, again, we are 9 talking about Greg and Drew? 10 A. Yes, Greg, Drew. They probably will 11 report again to the HR. 12 Q. Were you part of any conversations with 13 HR -- 14 A. No. 15 Q. -- around this concept of terminating 16 her employment? 17 A. I don't recall that I had conversation 18 with HR for the last step. 19 Q. What is your understanding of why Ruth 20 Briggs was terminated? 21 MS. SATINSKY: Objection to form. 22 THE WITNESS: Oh, yeah, because all 23 this series of these offenses, that ultimately 24 she dismissed.</p>

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<p style="text-align: right;">Page 145</p> <p>1 BY MR. MUNSHI:</p> <p>2 Q. Did anybody else play any sort of role</p> <p>3 in the termination of Ruth Briggs' employment,</p> <p>4 as far as you know?</p> <p>5 MS. SATINSKY: Objection to form</p> <p>6 THE WITNESS: I don't think so. But</p> <p>7 we spend more time to discuss how to help her</p> <p>8 instead of terminating her.</p> <p>9 BY MR. MUNSHI:</p> <p>10 Q. Do you recall any conversation with</p> <p>11 Deidre Walton about terminating her employment</p> <p>12 in the year 2014?</p> <p>13 A. I don't recall. Because most of the</p> <p>14 conversation with HR is just seeking whether we</p> <p>15 can help Ruth or find other job or any way we</p> <p>16 can help Ruth to improve the performance.</p> <p>17 Q. This idea of helping Ruth find another</p> <p>18 job, did you write any e-mails about what you</p> <p>19 were trying to do to help her?</p> <p>20 A. I didn't. I just request a meeting with</p> <p>21 HR. I request a meeting with dean's office.</p> <p>22 But there is no -- I mean they also try very</p> <p>23 hard, but they not find a simple job. There I</p> <p>24 seek help from HR, see if you can help Ruth.</p>	<p style="text-align: right;">Page 147</p> <p>1 A. Yeah.</p> <p>2 Q. Is there anybody else in human resources</p> <p>3 that you recall having these conversations with?</p> <p>4 A. I don't recall. Probably not.</p> <p>5 MS. SATINSKY: Objection to form</p> <p>6 THE WITNESS: Probably not, because</p> <p>7 I always deal with these two.</p> <p>8 BY MR. MUNSHI:</p> <p>9 Q. And did you ever discuss Ruth Briggs</p> <p>10 with Deidre Walton in person?</p> <p>11 A. Which one? In person with Deidre?</p> <p>12 Q. In person, like face to face?</p> <p>13 A. I don't know which format. Definitely</p> <p>14 we do phone conversation.</p> <p>15 Q. And with Deidre Walton, did you ever</p> <p>16 discuss with her finding another job for Ruth</p> <p>17 Briggs?</p> <p>18 A. Yeah, I think so. Because they informed</p> <p>19 me that HR could help because they know the</p> <p>20 availabilities.</p> <p>21 Q. And did Deidre Walton ever inform you</p> <p>22 that Ruth Briggs was in fact looking for another</p> <p>23 job internally?</p> <p>24 A. I don't recall.</p>
<p style="text-align: right;">Page 146</p> <p>1 Q. What meetings did you request with HR?</p> <p>2 A. I don't recall. I have multiple meeting</p> <p>3 with HR about Ruth.</p> <p>4 Q. In your meetings with HR, communications</p> <p>5 with HR, did you discuss finding another job for</p> <p>6 her?</p> <p>7 A. No. I just ask help. So Ruth is not</p> <p>8 performing and it's a big disruption to the</p> <p>9 department. Then what can we do? And they</p> <p>10 acknowledge that they understand problem with</p> <p>11 Ruth. They also trying. But ultimately, the</p> <p>12 decision by the new department head, whoever</p> <p>13 want to accept Ruth. It seem to me like no one</p> <p>14 want to accept Ruth.</p> <p>15 Q. Do you recall having any of these</p> <p>16 conversations with HR in the year 2014?</p> <p>17 A. I don't recall.</p> <p>18 Q. Do you recall these conversations with</p> <p>19 HR in the year 2013?</p> <p>20 A. Again, many times. I don't know which</p> <p>21 years I talked to. But I don't remember any</p> <p>22 conversation for the time that she got fired.</p> <p>23 Q. We talked about Deidre Walton and we</p> <p>24 talked about Sharon Boyle.</p>	<p style="text-align: right;">Page 148</p> <p>1 Q. But you did know that from some source?</p> <p>2 A. Yes, from sources she's looking, but was</p> <p>3 not successful.</p> <p>4 Q. And did you ever have a discussion with</p> <p>5 Deidre Walton or anyone in HR about why</p> <p>6 Miss Briggs wanted to move away from you?</p> <p>7 MS. SATINSKY: Objection to form.</p> <p>8 Asked and answered. He has already answered</p> <p>9 this question numerous times.</p> <p>10 MR. MUNSHI: What was the answer?</p> <p>11 MS. SATINSKY: Rahul, he has</p> <p>12 answered this question numerous times.</p> <p>13 MR. MUNSHI: What was the answer?</p> <p>14 MS. SATINSKY: You can answer one</p> <p>15 more time. If he asks it again, I am going to</p> <p>16 tell you not to answer it. So answer it one</p> <p>17 more time.</p> <p>18 BY MR. MUNSHI:</p> <p>19 Q. What was the answer?</p> <p>20 A. I don't think we discuss about that.</p> <p>21 Q. Do you recall seeing any documents, any</p> <p>22 notes, any e-mails, any handwritten notes from</p> <p>23 you or to you about why Ruth Briggs was being</p> <p>24 terminated?</p>

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<p style="text-align: right;">Page 149</p> <p>1 MS. SATINSKY: Objection to form.</p> <p>2 THE WITNESS: There's no e-mail.</p> <p>3 BY MR. MUNSHI:</p> <p>4 Q. Is there anyone who we haven't discussed</p> <p>5 yet who you spoke with at Temple about ending</p> <p>6 Miss Briggs' employment?</p> <p>7 A. Other than associate chair, Justin and</p> <p>8 Gene Kwanty.</p> <p>9 Q. Did either Justin or Gene Kwanty play</p> <p>10 any role in the decision to end the employment?</p> <p>11 A. Probably not. I just informed the fact</p> <p>12 that the problem with Ruth.</p> <p>13 MR. MUNSHI: Let's have this marked</p> <p>14 as <u>P-19</u>.</p> <p>15 (<u>P-19</u> was marked for</p> <p>16 identification.)</p> <p>17 THE WITNESS: (Pause.)</p> <p>18 Okay.</p> <p>19 BY MR. MUNSHI:</p> <p>20 Q. So in front of you, <u>P-19</u>, is a letter</p> <p>21 dated April 1, 2014, signed by Greg Wacker.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Did you review this document prior to</p>	<p style="text-align: right;">Page 151</p> <p>1 wrong dates?</p> <p>2 MS. SATINSKY: Objection to form.</p> <p>3 THE WITNESS: It's always possible,</p> <p>4 but we can check the record.</p> <p>5 BY MR. MUNSHI:</p> <p>6 Q. And on the first incident with her</p> <p>7 failure to finish an expense reimbursement --</p> <p>8 A. Yeah.</p> <p>9 Q. -- do you recall talking with Ruth</p> <p>10 Briggs about that incident?</p> <p>11 A. Oh, yeah. Because that's the main thing</p> <p>12 that triggered.</p> <p>13 Q. Do you recall her stating that she could</p> <p>14 not access the information she needed?</p> <p>15 A. Yeah, I remember. But that's not the</p> <p>16 case. So somehow she -- I'm saying that she</p> <p>17 fabricate. So we caught her something that was</p> <p>18 not true. Then she got so upset the next</p> <p>19 morning.</p> <p>20 Q. I'm sorry, did you say you're not saying</p> <p>21 she fabricated or she did fabricate?</p> <p>22 A. I think she fabricated something.</p> <p>23 Q. I'm sorry, you are saying that she did</p> <p>24 fabricate?</p>
<p style="text-align: right;">Page 150</p> <p>1 April 1, 2014?</p> <p>2 A. I don't recall exactly, but I told Greg</p> <p>3 all the details about these three incidents.</p> <p>4 And Drew was in the loop, that he knows all of</p> <p>5 it.</p> <p>6 Q. When you say "three incidents," what are</p> <p>7 you referring to?</p> <p>8 A. Two incidents.</p> <p>9 MS. SATINSKY: He said "these"</p> <p>10 incidents.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. I thought you said three. "These"</p> <p>13 incidents is what you said?</p> <p>14 A. Yes.</p> <p>15 Q. On the second incident with booking a</p> <p>16 reservation for the wrong dates, do you see</p> <p>17 that?</p> <p>18 A. Yeah.</p> <p>19 Q. Did you have a conversation with Ruth</p> <p>20 Briggs where she said that you gave her the</p> <p>21 wrong dates?</p> <p>22 A. I don't recall. I don't think I gave</p> <p>23 her wrong dates.</p> <p>24 Q. Is that possible, that you gave her the</p>	<p style="text-align: right;">Page 152</p> <p>1 A. Yes.</p> <p>2 Q. So you are saying that she lied?</p> <p>3 MS. SATINSKY: Objection to form.</p> <p>4 Mischaracterizes testimony.</p> <p>5 You can answer the question.</p> <p>6 THE WITNESS: Yeah, I think so.</p> <p>7 Again, she just tried to cover</p> <p>8 herself, and when she did not complete it, then</p> <p>9 she tried to cover herself, but then she got</p> <p>10 caught the next morning.</p> <p>11 BY MR. MUNSHI:</p> <p>12 Q. Did she try to cover herself with regard</p> <p>13 to the Clint Whaley situation or did she admit</p> <p>14 to it?</p> <p>15 A. No, this she didn't admit to. She just</p> <p>16 covered herself and just say that document is</p> <p>17 not available. Grant number is not there, but</p> <p>18 in reality it is there.</p> <p>19 Q. So in your history with Ruth Briggs,</p> <p>20 there were instances where she did admit to</p> <p>21 making a mistake; right?</p> <p>22 MS. SATINSKY: Objection to form.</p> <p>23 THE WITNESS: I would say 90 to 95</p> <p>24 percent of the time she would not admit it. She</p>

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<p style="text-align: right;">Page 153</p> <p>1 just tried to find excuses. 2 BY MR. MUNSHI: 3 Q. But there were times that she did? 4 A. Just like one instance, the booking she 5 admit. 6 Q. In the years that she reported to you, 7 is that the only time you recall her admitting? 8 A. The major incidents. Most of the time 9 she would just come up with excuses. 10 Q. Shortly after Miss Briggs' employment 11 ended, did you have a conversation with Sandy 12 Foehl? 13 MS. SATINSKY: In connection with? 14 BY MR. MUNSHI: 15 Q. With Ruth Briggs? 16 A. I don't recall, because I may have had 17 several conversations with different agencies, 18 but this is already almost like three years. 19 Q. After Ruth Briggs is gone, after 20 employment is over, with whom do you recall 21 speaking about Ruth Briggs? 22 MS. SATINSKY: And I don't want you 23 to testify -- 24 BY MR. MUNSHI:</p>	<p style="text-align: right;">Page 155</p> <p>1 A. (Pause.) 2 Okay. 3 Q. The bottom e-mail is between Sandy Foehl 4 and Deidre Walton, the person in human 5 resources. 6 A. Uh-huh. 7 Q. At the end of Sandy Foehl's e-mail, she 8 writes, "I have an appointment with the 9 department chair this afternoon." 10 Do you see she wrote that? 11 A. Yes. 12 Q. This is dated April 4th, 2014. 13 A. Uh-huh. 14 Q. Do you see that? 15 A. Yeah, I saw it. 16 Q. Do you recall having a conversation with 17 Sandy Foehl around this time about Ruth Briggs? 18 A. As I say, I have lots of conversations 19 with different people, but this one I just did 20 not recall. 21 Q. After she was let go, did you have a 22 conversation with Greg Wacker about Ruth Briggs? 23 A. Not officially. She probably would 24 mention about Ruth and the situation.</p>
<p style="text-align: right;">Page 154</p> <p>1 Q. I am not talking about conversations 2 with lawyers. 3 MS. SATINSKY: You can testify if 4 you spoke with a lawyer, but I don't want you to 5 testify about what you spoke with with the 6 lawyer. So you can testify to the people that 7 you spoke with. 8 THE WITNESS: Oh, I spoke with my 9 colleagues about that, about Ruth. I just feel 10 sorry that ultimately she get dismissed. 11 BY MR. MUNSHI: 12 Q. Who are these people you spoke with 13 after she had already been -- 14 A. All my associate chairs, colleagues. 15 Q. Do you recall speaking with Sandy Foehl? 16 A. I don't recall that. 17 MR. MUNSHI: This is <u>P-20</u>, please. 18 THE WITNESS: As I say, I talked to 19 many people. 20 (<u>P-20</u> was marked for 21 identification.) 22 BY MR. MUNSHI: 23 Q. You have in front of you <u>P-20</u>. You can 24 take a moment and review that e-mail chain.</p>	<p style="text-align: right;">Page 156</p> <p>1 Q. What do you mean by "not officially"? 2 A. Officially means have an official 3 conversation how to deal with Ruth's situation 4 because Ruth is gone. So I don't think we had 5 any more conversation like that. 6 Q. How about Justin Shi, did you have any 7 conversations with him regarding Ruth Briggs 8 after she was gone? 9 A. No, we -- 10 MS. SATINSKY: Objection to form. 11 You can answer. 12 THE WITNESS: We occasionally talk 13 to -- I mean we mention about Ruth and we want 14 to find out what's her situation. So one of 15 staff report to me later that Ruth find a job. 16 I feel very happy because Ruth posted on her 17 website or Facebook. 18 BY MR. MUNSHI: 19 Q. Is that how you found out that she found 20 a job? 21 A. Yeah. 22 Q. Did you have any conversations with 23 Deidre Walton after Ruth Briggs' employment 24 ended about Ruth Briggs?</p>

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1 A. I don't recall.
2 Q. How about anybody in HR?
3 A. I don't recall that. Because the timing
4 I get confused whether it is before her
5 termination or after her termination. I have
6 numerous conversations with HR about Ruth, yeah.
7 Q. Before and after the termination?
8 A. I don't recall whether it is before or
9 after.
10 Q. Okay.
11 A. I'm not sure if there is a conversation
12 after Ruth's termination.
13 MR. MUNSHI: This is P-21.
14 (P-21 was marked for
15 identification.)
16 BY MR. MUNSHI:
17 Q. In front of you is an e-mail chain P-21.
18 You can take a moment and review it.
19 A. (Pause.)
20 Okay.
21 Q. The oldest e-mail in this chain on the
22 bottom of the first page, it is from Sandy Foehl
23 to you dated August 8th, 2014. Do you see that?
24 A. Yeah.

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1 Q. And she writes to you, "Dear Dr. Wu,
2 there is a particular allegation in Ruth Briggs'
3 complaint, the US Equal Employment Opportunity
4 Commission, that I need to review with you."
5 A. Uh-huh.
6 Q. Did you end up speaking with Sandy
7 Foehl?
8 A. Yeah, now I recall. I think she kind
9 of -- she came to my office and discussed.
10 Q. What do you recall about that
11 conversation?
12 A. Because she just say that -- I don't
13 remember her role. She's not a university
14 official, but some kind of a union -- I'm not
15 sure. And then she just talked to me and then
16 she recorded our conversation.
17 Q. What do you mean she recorded it?
18 A. No, record means wrote down. But that's
19 the first time we were kind of surprised to know
20 that Ruth mentioned that we have this age
21 discrimination, because it is never in my mind
22 that there is age discrimination. And we have a
23 couple of staff much older than Ruth and we
24 don't discriminate.

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1 Q. Was Sandy Foehl taking notes during this
2 conversation with you?
3 A. I think so.
4 Q. Handwritten notes or on a computer?
5 A. I think it's hand notes. She's more
6 tradition. Now I remember this. She's a very
7 nice lady.
8 Q. And do you recall her asking you
9 questions about Ruth Briggs?
10 A. Yeah, she ask questions.
11 Q. What do you recall her asking?
12 A. I don't remember. I think that time
13 about age-related issue. I said that's really
14 surprised. Never in my mind that we
15 discriminate Ruth based on age.
16 Q. Did she say anything to you about
17 complaints that Ruth raised about you?
18 A. I don't know exactly what kind of
19 complaints. Actually I never know that I'm the
20 main target person by Ruth. I always think that
21 I'm the one protecting Ruth.
22 Q. Is that what Sandy told you, that you
23 were the main target?
24 A. No, no one told me. Until today. This

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1 looks like this is the one target to me.
2 Q. She writes here in P-21, "There is a
3 particular allegation in Ruth Briggs'
4 complaint."
5 Was there a particular allegation
6 that she asked you about?
7 A. Yeah, I think that's the age stuff.
8 Q. Did she ask you if you ever made any age
9 comments to Ruth?
10 A. I don't recall the details.
11 Q. Did she ask you if you ever made any
12 sex-based or gender-based comments to Ruth?
13 A. No, no. I mean I would never make those
14 kind of comments to Ruth.
15 Q. Do you recall any questions that she
16 asked you during this meeting?
17 A. I don't recall that.
18 Q. How long was this meeting?
19 A. It's about 15 minutes to a half an hour.
20 It's not long.
21 Q. And we talked about different people who
22 you spoke with after Ruth Briggs had left
23 Temple, and again, we don't want to get into the
24 conversations that you had with any lawyers.

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<p style="text-align: right;">Page 161</p> <p>1 A. Uh-huh.</p> <p>2 Q. But did you speak with any lawyers in</p> <p>3 2014 about Ruth Briggs?</p> <p>4 A. I don't think so. The lawyers are very,</p> <p>5 very late. Until these things happen, then I</p> <p>6 get approached. And everyone got surprised that</p> <p>7 this thing is still continuing.</p> <p>8 Q. In the year 2014, did anybody ask you if</p> <p>9 you ever made comments to Ruth Briggs about the</p> <p>10 mandatory retirement law in China?</p> <p>11 MS. SATINSKY: Except to the extent</p> <p>12 you had any discussions about that with an</p> <p>13 attorney.</p> <p>14 THE WITNESS: No. But I do recall</p> <p>15 that we have some conversation in the faculty,</p> <p>16 information about age discrimination. So</p> <p>17 everyone laugh at that.</p> <p>18 BY MR. MUNSHI:</p> <p>19 Q. Who had this conversation?</p> <p>20 A. I think it was Justin and Gene.</p> <p>21 Q. Who was laughing?</p> <p>22 A. Laughing means that they find it absurd.</p> <p>23 Not that they are laughing. They just find it</p> <p>24 absurd.</p>	<p style="text-align: right;">Page 163</p> <p>1 I never -- she never complained to me in person</p> <p>2 about any of these allegations.</p> <p>3 Q. And it is your testimony that she never</p> <p>4 complained to you about you treating her</p> <p>5 differently than other people in the workplace?</p> <p>6 A. No.</p> <p>7 Q. Even though we just saw that e-mail</p> <p>8 earlier where she talked about fairness in the</p> <p>9 workplace?</p> <p>10 A. No. To be honest, that's a long e-mail.</p> <p>11 I do not even remember. I saw that I sent this.</p> <p>12 But even I saw that I sent this, I don't think</p> <p>13 that's sufficient.</p> <p>14 Q. Did you meet with Sandy Foehl any other</p> <p>15 time besides the one that we just talked about?</p> <p>16 A. I don't recall. Maybe we met twice, but</p> <p>17 definitely once in my office.</p> <p>18 Q. Did she ever tell you that she</p> <p>19 personally had conversations with Ruth Briggs</p> <p>20 about filing a complaint?</p> <p>21 A. I don't recall. Likely she told me that</p> <p>22 she had also met Ruth.</p> <p>23 Q. Sorry, say that again?</p> <p>24 MS. SATINSKY: Also met Ruth.</p>
<p style="text-align: right;">Page 162</p> <p>1 Q. And this is regarding Ruth, or in</p> <p>2 general?</p> <p>3 A. Regarding Ruth's allegation.</p> <p>4 Q. Was this at a faculty meeting or</p> <p>5 something else?</p> <p>6 A. No, no. It's just private meeting. We</p> <p>7 never discuss this.</p> <p>8 Q. You, Justin and Gene?</p> <p>9 A. Yes.</p> <p>10 Q. What did you discuss?</p> <p>11 A. Just said it looks like there is a</p> <p>12 lawsuit from Ruth.</p> <p>13 Q. What else did you say?</p> <p>14 A. I didn't say in detail.</p> <p>15 Q. Did you tell him that the allegations</p> <p>16 were that you discriminated against her?</p> <p>17 A. I don't recall exactly, but maybe I</p> <p>18 mentioned that looks like there's age-related</p> <p>19 discrimination.</p> <p>20 Q. Do you recall mentioning to them that</p> <p>21 she has alleged that you retaliated against her?</p> <p>22 A. No. Retaliated, never. This is the</p> <p>23 first time I saw this today. But I never do</p> <p>24 that. Because there is no age discrimination.</p>	<p style="text-align: right;">Page 164</p> <p>1 THE WITNESS: She also met Ruth.</p> <p>2 BY MR. MUNSHI:</p> <p>3 Q. So she did tell you that?</p> <p>4 MS. SATINSKY: She said she met</p> <p>5 Ruth.</p> <p>6 BY MR. MUNSHI:</p> <p>7 Q. Sorry. I got lost. Sandy said what?</p> <p>8 A. Sandy mainly focus on the questions to</p> <p>9 me. So I just answer some questions. She just</p> <p>10 have prepared list of questions like you, so I</p> <p>11 just answered.</p> <p>12 MR. MUNSHI: Give me two minutes.</p> <p>13 Let me just review something here.</p> <p>14 (Pause.)</p> <p>15 MR. MUNSHI: I have no further</p> <p>16 questions.</p> <p>17 I just wanted to circle back that to</p> <p>18 the extent any of those handwritten notes with</p> <p>19 Sandy Foehl do exist, I need those, but we can</p> <p>20 talk about that later.</p> <p>21 MS. SATINSKY: I will certainly ask</p> <p>22 about them.</p> <p>23 I have no questions at this time,</p> <p>24 and the witness reserves the right to read and</p>

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<p style="text-align: right;">Page 165</p> <p>1 sign.</p> <p>2 MR. MUNSHI: Thank you, sir.</p> <p>3 (Witness excused.)</p> <p>4 - - -</p> <p>5 (The deposition concluded at</p> <p>6 1:01 p.m.)</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 167</p> <p>1 E X H I B I T S (cont'd):</p> <p>2 JIE WU DEPOSITION EXHIBITS MARKED</p> <p>3 <u>P-16</u> E-mail string, TEMPLE 0000579 122</p> <p>4 <u>P-17</u> E-mail string, TEMPLE 0000586 124</p> <p>5 <u>P-18</u> Disciplinary Report TEMPLE 0170 135</p> <p>6 <u>P-19</u> Letter dated April 1, 2014, from 149</p> <p>7 Mr. Wacker to Ms. Briggs, TEMPLE 0171</p> <p>8 <u>P-20</u> E-mail string, Temple University 154</p> <p>9 (R. Briggs) - 0000023</p> <p>10 <u>P-21</u> E-mail string, Temple University 157</p> <p>11 (R. Briggs) - 0000286 - 287</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
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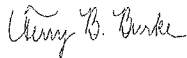
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I HEREBY CERTIFY that the
proceedings, evidence and objections are
contained fully and accurately in the
stenographic notes taken by me upon the
foregoing matter on Wednesday, May 31, 2017, and
that this is a true and correct transcript of
same.



Terry Barbano Burke, RMR-CRR

(The foregoing certification
of this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision of
the certifying reporter.)

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